

RCRA Hazardous Waste Facility  
Part B Permit Renewal Application

Safety-Kleen Systems, Inc.

Pasadena, TX

EPA ID No. TXD 000 747 386

HW-50260





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# PART A



# Texas Commission on Environmental Quality Instructions and Procedural Information for Filing a Permit Application for a Hazardous Waste Storage, Processing, or Disposal Facility

## Part A

**[Form Availability:** This form, along with other Industrial and Hazardous Waste documents, is available online at: [https://www.tceq.texas.gov/permitting/waste\\_permits/iHW\\_permits/iHW\\_permit\\_forms.html](https://www.tceq.texas.gov/permitting/waste_permits/iHW_permits/iHW_permit_forms.html). The number for this form is 0283. Questions may be e-mailed to [iHWper@tceq.texas.gov](mailto:iHWper@tceq.texas.gov).]

### General Instructions

1. A person (individual, corporation or other legal entity) who stores, processes or disposes of hazardous waste (except where such storage and/or processing is excluded from permit requirements in accordance with 30 Texas Administrative Code (TAC) Section 335.2) must obtain a permit pursuant to the Texas Health and Safety Code. In applying to the Texas Commission on Environmental Quality, hereafter referred to as the Commission, the applicant shall follow the procedures outlined below, on the application and in the Rules of the Commission.
2. The application (one original plus three (3) complete copies<sup>1</sup>) should be mailed to:

Texas Commission on Environmental Quality  
Attention: Waste Permits Division, MC126  
P. O. Box 13087  
Austin, Texas 78711-3087

**Note:** TCEQ will publish electronic copies of the application and associated documents online. Applicants must provide copy of the administratively complete application and technically complete application. The electronic copy provided would be the current, complete version with revisions and replacements made throughout the document and without redline/ strikeout text. TCEQ will also publish electronic versions of NOD responses online.

3. Signature on Application [30 TAC 305.44]. The application shall be signed by the owner and operator or by a duly authorized agent, employee, officer, or representative of the owner or operator and shall be verified before a notary public. When another person signs on behalf of the owner and operator, this person's title or relationship to the owner or operator should be shown. In all cases, the person signing the form should be authorized to do so by the owner or operator (the Commission may require a person

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<sup>1</sup> The third copy may optionally consist of paper copies of all plans and maps and a computer diskette of the remaining document. The document should be formatted in Word processing software up to and including version 6.1 or a 100% compatible format. Files may be compressed using PKZIP Ver. 2 or a 100% compatible program.

signing on behalf of an owner or operator to provide proof of authorization). An application submitted for a corporation must be signed by (or the signatory must be authorized by) a responsible corporate officer such as a president, secretary, treasurer, vice-president, or designated manager; or for a partnership or sole proprietorship, by a general partner or the proprietor, respectively. In the case of a municipal, state, federal, or other public facility, the application shall be signed by either a principal executive officer or ranking elected official.

4. An application will not be processed until all information required to properly evaluate the application has been obtained. When an application is severely lacking in detail and/or the applicant fails to submit additionally requested information in a timely manner, the application will not be considered to be "filed in accordance with the rules and regulations of the Commission."

Please submit any application revisions with a revised date and page numbers at the bottom of the page(s).

#### 5. Fees and Costs

- a. The fee for filing an application is discussed in Section XII of Part B, form number TCEQ-0376.
  - b. The applicant for a permit is required to bear the cost of publication of notice of the application in a newspaper as prescribed by 30 TAC Section 39.405(f).
6. A person may not commence operation of a hazardous waste management facility until the Commission has issued a permit to authorize the storage, processing, or disposal of hazardous waste, except with the approval of the Commission.

#### 7. Designation of Material as Confidential

The designation of material as confidential is frequently carried to excess. The Commission has a responsibility to provide a copy of each application to other review agencies and to interested persons upon request and to safeguard confidential material from becoming public knowledge. Thus, the Commission requests that the applicant (1) be prudent in the designation of material as confidential and (2) submit such material only when it might be essential to the staff in their development of a recommendation.

The Commission suggests that the applicant NOT submit confidential information as part of the permit application. However, if this cannot be avoided, the confidential information should be described in non-confidential terms throughout the application, and submitted as a document or binder, and conspicuously marked "CONFIDENTIAL."

Reasons of confidentiality include the concept of trade secrecy and other related legal concepts which give a business the right to preserve confidentiality of business information to obtain or retain advantages from its right in the information. This includes authorizations under 18 U.S.C. 1905 and special rules cited in 40 CFR Chapter I, Part 2, Subpart B.

Section 361.037 of the Texas Health and Safety Code does not allow an applicant for an industrial and hazardous waste permit to claim as confidential any record pertaining to the characteristics of the industrial solid waste.

The applicant may elect to withdraw any confidential material submitted with the application. However, the permit cannot be issued, amended, or modified if the application is incomplete.



## Part II

### Procedural Information

After the submittal of Parts A and B of the application, the TCEQ will provide public notice of receipt of the application. The Executive Director's staff will review the application for completeness of information submitted. During the review, the applicant may be contacted for clarification or additional information. When all pertinent information is present, the application or a summary of its contents will be forwarded for review by other state agencies and local governmental entities interested in water quality control and solid waste management. After technical evaluation, opportunity for public hearing will be afforded.

Note that for facilities which had "commenced on-site storage, processing, or disposal of hazardous waste" [see 30 TAC Section 335.43(b)] on or before the date such waste is identified or listed as hazardous by EPA, the Texas Health and Safety Code provides in Section 361.082(f) that these facilities may continue to manage hazardous waste until such time as the Commission approves or denies the application, provided that the applicant has filed the permit application in accordance with the rules and regulations of the Commission.

The Commission may act upon an application for a permit, permit amendment, permit modification, or renewal of a permit without the necessity of holding a public hearing:

1. (a) When notice of the application has been mailed to persons possibly affected by the proposed permit; and  
  
(b) When notice has been published at least once in a newspaper regularly published or circulated within each county where the proposed facility is located; and  
  
(c) Within forty-five (45) days following publication of the Commission's notice, a Commissioner, the Executive Director or an affected person has not requested a public hearing; or
2. For a Class 1 or a Class 2 permit modification or a minor amendment to a permit. The Commission may, in certain cases, hold a public hearing for a Class 2 permit modification or a minor amendment.

A public hearing may be scheduled on an application for a RCRA hazardous waste permit when requested by a Commissioner, the Executive Director, or an affected person within forty-five (45) days following the newspaper publication.

Requirements of Giving Notice of the Application:

1. By the Applicant: Every applicant for a permit, permit amendment, permit modification, or permit renewal shall publish notice (see note below) of the application at least once in a newspaper regularly published or circulated within each county where the proposed facility is located. Where a public hearing has been requested, notice will be mailed to the applicant in ample time for publication, which shall be not less than thirty (30) days prior to the date set for the hearing. Except in the case of a notice of a permit modification request, the Commission will mail the appropriate notice and instructions for publication to the applicant.

NOTE: Additional publication and direct mail notice to affected persons will result if a public hearing is requested following newspaper publication of the notice of application. The cost of providing this additionally required publication and service of notice to affected persons will be assumed by the applicant.

2. By the Texas Commission on Environmental Quality: The Commission will mail notice of

the application (except for permit modifications) to affected persons and certain governmental entities. The notice will be mailed at the same time instructions for newspaper publications are mailed to the applicant.

3. Bilingual Notice Instructions:

For certain permit applications, public notice in an alternate language is required. If an elementary school or middle school nearest to the facility offers a bilingual program, notice may be required to be published in an alternative language. The Texas Education Code, upon which the TCEQ alternative language notice requirements are based, requires a bilingual education program for an entire school district should the requisite alternative language speaking student population exist. However, there may not be any bilingual-speaking students at a particular school within a district which is required to offer the bilingual education program. For this reason, the requirement to publish notice in an alternative language is triggered if the nearest elementary or middle school, as part of a larger school district, is required to make a bilingual education program available to qualifying students and either the school has students enrolled at such a program on-site, or has students who attend such a program at another location to satisfy the school's obligation to provide such a program.

If it is determined that a bilingual notice is required, the applicant is responsible for ensuring that the publication in the alternate language is complete and accurate in that language. Electronic versions of the Spanish template examples are available from the TCEQ to help the applicant complete the publication in the alternative language.

**Bilingual Notice Application Form:**

**Bilingual notice confirmation for this application:**

1. Is the school district of the elementary or middle school nearest to the facility required by the Texas Education Code to have a bilingual program?

YES  NO

(If NO, alternative language notice publication not required)

2. If YES to question 1, are students enrolled in a bilingual education program at either the elementary school or the middle school nearest to the facility?

YES  NO

(If YES to questions 1 and 2, alternative language publication is required; If NO to question 2, then consider the next question)

3. If YES to question 1, are there students enrolled at either the elementary school or the middle school nearest to the facility who attend a bilingual education program at another location?

YES  NO

(If Yes to questions 1 and 3, alternative language publication is required; If NO to question 3, then consider the next question)

4. If YES to question 1, would either the elementary school or the middle school nearest to the facility be required to provide a bilingual education program but for the fact that it secured a waiver from this requirement, as available under 19 TAC 89.1205(g)?

YES  NO

**(If Yes to questions 1 and 4, alternative language publication is required; If NO to question 4, alternative language notice publication not required)**

If a bilingual education program(s) is provided by either the elementary school or the middle school nearest to the facility, which language(s) is required by the bilingual program? \_\_\_\_\_

Consideration of the Permit Application by the Commission:

The applicant will be notified by the Commission when the application is set for final consideration. If the Commission issues the permit, the applicant will be mailed a copy of the permit by the TCEQ Office of the Chief Clerk within one (1) month following Commission approval. (NOTE: Only one copy is mailed to the applicant and that copy will be sent to the official mailing address of the applicant as shown on the permit application form.)

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**Texas Commission on Environmental Quality**  
**Permit Application for a Hazardous Waste Storage/Processing/Disposal Facility**  
**Part A - Facility Background Information**

I. General Information

A. Facility Name: Safety-Kleen Systems, Inc.

(Individual, Corporation, or Other Legal Entity Name)

TCEQ Solid Waste Registration No: 71143 EPA I.D. No.: TXD000747386

Street Address (If Available): 3333 Federal Road

City: Pasadena, State: TX Zip Code: 77504

County: Harris

Telephone Number: 781-792-5000 Charter Number: 2930806

If the application is submitted on behalf of a corporation, please identify the Charter Number as recorded with the Office of the Secretary of State for Texas.

B. Facility Contact

1. List those persons or firms who will act as primary contact for the applicant during the processing of the permit application. Also indicate the capacity in which each person may represent the applicant (engineering, legal, etc.). The person listed first will be the primary recipient of correspondence regarding this application. Include the complete mailing addresses and phone numbers.

**Ricardo Saucedo, Sr. Environmental Compliance Manager**  
**5243 Sinclair Rd., San Antonio, TX 78222**  
**Phone Number: 210-241-2619**  
**Email: [REDACTED]**

2. If the application is submitted by a corporation or by a person residing out of state, the applicant must register an Agent in Service or Agent of Service with the Texas Secretary of State's office and provide a complete mailing address for the agent. The agent must be a Texas resident.  
N/A

C. Operator<sup>1</sup>: Identify the entity who will conduct facility operations.

Operator Name: Safety-Kleen Systems, Inc.

Address: 3333 Federal Road

City: Pasadena, State: TX Zip Code: 77504

Telephone Number: 781-792-5000 Charter Number: 2930806

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<sup>1</sup> The operator has the duty to submit an application if the facility is owned by one person and operated by another [30 TAC 305.43(b)]. The permit will specify the operator and the owner who is listed on this application [Section 361.087 Texas Health and Safety Code].

**D. Owner**

1. Indicate the ownership status of the facility:

a. Private X

- (1) X Corporation
- (2) \_\_\_\_\_ Partnership
- (3) \_\_\_\_\_ Proprietorship
- (4) \_\_\_\_\_ Non-profit organization

b. Public \_\_\_\_\_

- (1) \_\_\_\_\_ Federal
- (2) \_\_\_\_\_ Military
- (3) \_\_\_\_\_ State
- (4) \_\_\_\_\_ Regional
- (5) \_\_\_\_\_ County
- (6) \_\_\_\_\_ Municipal
- (7) \_\_\_\_\_ Other (specify)

2. Does the operator own the facility units and facility property?

Yes  No

If you checked "no",

- a. Submit as "Attachment A" a copy of the lease for use of or the option to buy said facility units and/or facility property, as appropriate; and
- b. Identify the facility units' owner(s) and/or facility property owner(s). Please note that the owner(s) is/are required to sign the application on page 5.

Owner Name: CIMA INTERESTS LLC

Address: 3333 Federal Road

City: Pasadena, State: TX Zip Code: 77504

Telephone Number: \_\_\_\_\_

Owner Name: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_, State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Telephone Number: \_\_\_\_\_

**E. Type of Application Submittal:**

Initial \_\_\_\_\_ or Revision X

**F. Registration and Permit Information**

Indicate (by listing the permit number(s) in the right-hand column below) all existing or pending State and/or Federal permits or construction approvals which pertain to pollution control or industrial solid waste management activities conducted by your plant or at your location. Complete each blank by entering the *permit number*, or the *date of application*, or "none".

Relevant Program and/or Law	Permit No.	Agency*
1. Texas Solid Waste Disposal Act	<u>None</u>	<u>None</u>
2. Wastewater disposal under the Texas Water Code	<u>None</u>	<u>None</u>
3. Underground injection under the Texas Water Code	<u>None</u>	<u>None</u>
4. Texas Clean Air Act	<u>None</u>	<u>None</u>
5. Texas Uranium Surface Mining & Reclamation Act	<u>None</u>	<u>None</u>
6. Texas Surface Coal Mining & Reclamation Act	<u>None</u>	<u>None</u>
7. Hazardous Waste Management program under the Resource Conservation and Recovery Act	<u>HW-50260</u>	<u>TCEQ</u>
8. UIC program under the Safe Drinking Water Act	<u>None</u>	<u>None</u>
9. TPDES program under the Clean Water Act	<u>None</u>	<u>None</u>
10. PSD program under the Clean Air Act	<u>None</u>	<u>None</u>
11. Nonattainment program under the Clean Air Act	<u>None</u>	<u>None</u>
12. National Emission Standards for Hazardous Pollutants (NESHAP) Pre-construction approval under the Clean Air Act	<u>None</u>	<u>None</u>
13. Ocean dumping permits under the Marine Protection Research and Sanctuaries Act	<u>None</u>	<u>None</u>
14. Dredge or fill permits under section 404 of the Clean Water Act	<u>None</u>	<u>None</u>
15. Other relevant environmental permits	<u>2080-A</u>	<u>City of Pasadena</u>

\*Use the following acronyms for each agency as shown below:

TCEQ = Texas Commission on Environmental Quality  
TRC = Texas Railroad Commission  
TDH = Texas Department of Health  
TDA = Texas Department of Agriculture  
EPA = U.S. Environmental Protection Agency  
CORPS = U.S. Army Corps of Engineers

G. Give a brief description of the nature of your business.

**The Safety-Kleen Pasadena facility formerly served businesses that generate hazardous waste fluids. Primary customers were small quantity generators, including auto repair facilities, auto body repair shops, fleet operators, dry cleaners, and manufacturing plants. Equipment, clean solvent, and antifreeze were provided to these customers. Spent solvent, and antifreeze regulated as a hazardous waste, was collected for recycling and reuse. Current activity is Corrective Action under a Compliance Plan.**

H. TCEQ Core Data Form

The TCEQ requires that a Core Data Form (Form 10400) be submitted on all incoming applications. For more information regarding the Core Data Form, call (512) 239-1575 or go to the TCEQ website at [http://www.tceq.texas.gov/permitting/central\\_registry/guidance.html](http://www.tceq.texas.gov/permitting/central_registry/guidance.html).

Signature Page

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Operator Signature: [Signature] Date: 1/24/2026

Name and Official Title (type or print): Sr. Env Compliance Manager

Operator Signature: N/A Date: N/A

Name and Official Title (type or print): N/A

Operator Signature: N/A Date: N/A

Name and Official Title (type or print): N/A

Owner Signature: N/A Date: N/A

Name and Official Title (type or print): N/A

To be completed by the operator if the application is signed by an authorized representative for the operator

I, N/A hereby designate N/A  
(operator) (authorized representative)

as my representative and hereby authorize said representative to sign any application, submit additional information as may be requested by the Commission; and/or appear for me at any hearing or before the Texas Commission on Environmental Quality in conjunction with this request for a Texas Water Code or Texas Solid Waste Disposal Act permit. I further understand that I am responsible for the contents of this application, for oral statements given by my authorized representative support of the application, and for compliance with the terms and conditions of any permit which might be issued based upon this application.

N/A  
Printed or Typed Name of Operator or Principal Executive Officer

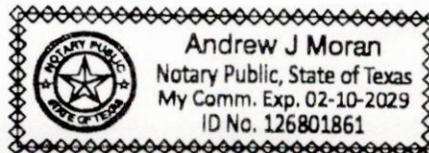
Signature

(Note: Application Must Bear Signature & Seal of Notary Public)

Subscribed and sworn to before me by the said Ricardo Saucedo on this  
24 day of January, 2026.

My commission expires of the 10 day of February, 2029

[Signature]  
Notary Public in and for Brewer County, Texas



II. Facility Background Information

A. Location of Facility for which the application is submitted

1. Give a description of the location of the facility site with respect to known or easily identifiable landmarks.

**The facility is located about three miles northeast of Ellington Air Force Base and 1/4 mile south of the Spencer Highway.**

2. Detail the access routes from the nearest U.S. or State Highway to the facility.

**The site may be accessed most easily from IH-45 South. Take Edgebrook to the east, which turns into Fairmont Parkway. Take Federal Road to the north to 3333 Federal Road.**

3. Enter the geographical coordinates of the facility:

Latitude: 29 deg 39 min 36 sec

Longitude: 95 deg 11 min 35 sec

4. Is the facility located on Indian lands?

Yes  No

B. Legal Description of Facility

Submit as "Attachment B" a legal description(s) of the tract or tracts of land upon which the waste management operations referred to in this permit application occur or will occur. Although a legal description is required, a metes and bounds description is not necessary for urban sites with appropriate "lot" description(s). A survey plat or facility plan drawing which shows the specific points referenced in the survey should also be included in Attachment B.

C. SIC Codes

List, in descending order of significance, the four digit standard industrial classification (SIC) codes which best describe your facility in terms of the principal products or services you produce or provide. Also, specify each classification in words. These classifications may differ from the SIC codes describing the operation generating the hazardous wastes.

4-digit SIC Code	Description
	N/A - Closed Facility

SIC code numbers are descriptions which may be found in the Standard Industrial Classification Manual prepared by the Executive Officer of the President, Office of Management and Budget, which is available from the Government Printing Office, Washington, D.C. Use the current edition of the manual.

### III. Wastes and Waste Management

#### A. Waste Generation and Management Activities

Is any hazardous waste [see Title 40, Code of Federal Regulations (CFR), Part 261] presently or proposed to be generated or received at your facility?

Yes  No

**If no**, skip to question Number 2 below.

**If yes**, answer the following question.

1. Are you presently registered with TCEQ as a solid waste generator?

Yes  No  Pending

**If no**, contact the Industrial and Hazardous Waste Division of TCEQ in Austin, Texas to obtain registration information. Also, continue with the application form (go to Number 2 below).

**If yes**, go to Section I of your TCEQ Notice of Registration, determine which of your wastes are hazardous, and list these wastes (and mixtures) in Table III-1 (see Number 2 below).

2. Complete Table III-1, Hazardous Wastes and Management Activities, below, listing all hazardous wastes, all mixtures containing any hazardous wastes, and hazardous debris which were, are presently, or are proposed to be handled at your facility in interim status or permitted units. See 40 CFR 261 and 268.2, attaching additional copies as necessary.

*Guidelines for the Classification & Coding of Industrial Wastes and Hazardous Wastes*, TCEQ publication RG-22, contains guidance on how to properly classify and code industrial waste and hazardous waste in accordance with 30 TAC 335.501-335.515 (Subchapter R).

If you are not registered with TCEQ, enter "NA" for TCEQ Waste Code Number.

For the EPA Hazardous Waste Numbers, see 40 CFR 261.20-33. For annual quantity, provide the amount in units of pounds (as generated and/or received) for each waste and/or waste mixture.

#### B. Waste Management Units Summary

1. For each waste and waste mixture listed in Table III-1 that is stored, processed, and/or disposed on-site (except where such storage and/or processing is excluded from permit requirements in accordance with Texas Administrative Code (TAC) Section 335), complete Table III-2, Hazardous Waste Management Unit Checklist, and enter the name of each hazardous waste management unit (Note: Please make copies of Table III-2 if necessary).

Give the design capacity of each hazardous waste management unit in any of the units of measure shown. In the case of inactive or closed units for which design details are unavailable, an estimate of the design capacity is sufficient.

Please provide a description for each waste management unit described in your own words on the line provided for "Waste Management Unit."

2. Has the applicant at any time conducted the on-site disposal of industrial solid waste now identified or listed as hazardous waste?

Yes  No

**If yes**, complete Table III-2 indicating the hazardous waste management units which were once utilized at your plant site but are no longer in service (i.e., inactive or closed facility units).

**If no**, and if no hazardous waste is presently or proposed to be stored [for longer than 90 days (see 30 TAC Section 335.53)], processed, or disposed of at your facility, then you need not file this permit application. Otherwise proceed with the application form.

3. Provide an estimate of the total weight (lbs) of hazardous waste material that has been disposed of and/or stored within your site boundaries and not removed to another site.     0 Pounds

C. Location of Waste Management Units    N/A

1. Submit as "Attachment C" a drawn-to-scale topographic map (or other map if a topographic map is unavailable) extending one mile beyond the facility boundaries, depicting the following:
  - a. The approximate boundaries of the facility (described in Section II.B) and within these boundaries, the location and boundaries of the areas occupied by each active, inactive, and proposed hazardous waste management unit (see Table III-2). Each depicted area should be labeled to identify the unit(s), unit status (i.e., active, inactive, or proposed), and areal size in acres.
  - b. The overall facility and all surface intake and discharge structures;
  - c. All on-site injection wells where liquids are injected underground;
  - d. All known monitor wells and boreholes within the property boundaries of the facility; and
  - e. All wells, springs, other surface water bodies, and drinking water wells listed in public records or otherwise known to the applicant within the map area and the purpose for which each water well is used (e.g., domestic, livestock, agricultural, industrial, etc.).
2. Submit as "Attachment D" photographs which clearly delineate all hazardous waste management storage, processing, and disposal units, as well as sites of future storage, processing and disposal units.

D. Flow Diagram/Description    N/A

Show as "Attachment E" process flow diagrams and step-by-step word descriptions of the process flow, depicting the handling, collection, storage, processing, and/or disposal of each of the hazardous wastes previously listed in this application.

The flow diagrams or descriptions should include the following information:

1. Originating point of each waste and waste classification code;
2. Means of conveyance utilized in every step of the process flow;
3. Name and function of each facility component through which the waste passes;
4. The ultimate disposition of all wastes (if off-site, specify "off-site") and waste residues.

#### IV. Index Of Attachments

List and index below all attachments to this application and indicate if included or not included:

<b>Item</b>	<b>Attachments</b>	<b>Attachment</b>	<b>Included</b>	<b>Not Included</b>
I.D.2.a	Lease/Option to buy	A		x
II.B	Site legal description	B	x	
III.C.1	Facility boundaries and adjacent waters map	C	X	
III.C.2	Photographs	D		x
III.D	Process flow diagram/description	E		X

**Table III-1 – Hazardous Wastes and Management Activities**

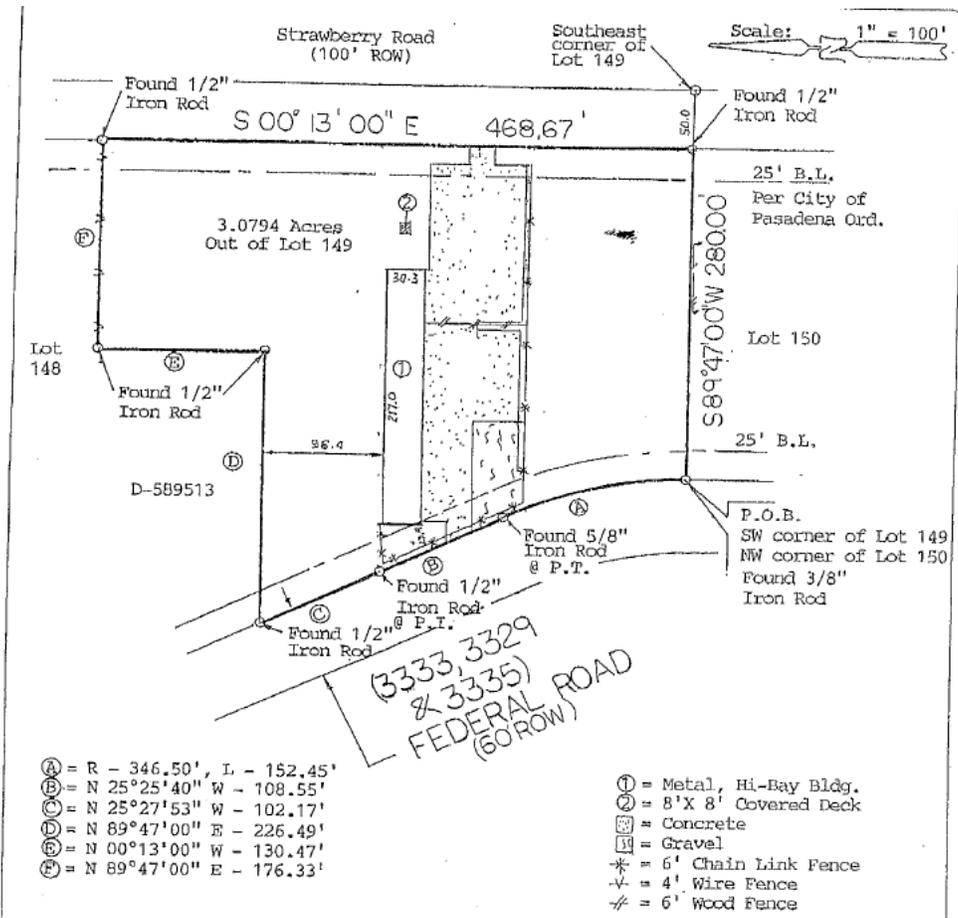
<b>Verbal Description of Waste</b>	<b>TCEQ Waste for Code and Classification Code</b>	<b>EPA Hazardous Waste Number</b>	<b>Storage<sup>1</sup> of Wastes Received from Off-Site</b>	<b>Processing<sup>2</sup> of Wastes Received from Off-Site</b>	<b>Disposal of Wastes Received from Off-Site</b>	<b>Storage<sup>1</sup> of Wastes Generated On-Site</b>	<b>Processing<sup>2</sup> of Wastes Generated On-Site</b>	<b>Disposal of Wastes Generated On-Site</b>	<b>Annual Quantity Generated and/or Received</b>
Non-haz waste water from ground water sampling and recovery wells	03021192	N/A	No	No	No	Satellite Accumulation Areas	No	No	100 gallons

<sup>1</sup> "Storage" means the holding of solid waste for a temporary period, at the end of which the waste is processed, disposed of, or stored elsewhere.

<sup>2</sup> "Processing" means the extraction of materials, transfer, volume reduction, conversion to energy, or other separation and preparation of solid waste for reuse or disposal, including the treatment or neutralization of hazardous waste, designed to change the physical, chemical, or biological character or composition of any hazardous waste so as to neutralize such waste, or so as to recover energy or material from the waste or so as to render such waste non-hazardous or less hazardous; safer for transport, store or dispose of; or amenable for recovery, amenable for storage, or reduced in volume. The "transfer" of solid waste for reuse or disposal as used above, does not include the actions of a transporter in conveying or transporting solid waste by truck, ship, pipeline, or other means. Unless the Executive Director determines that regulation of such activity is necessary to protect human health or the environment, the definition of "processing" does not include activities relating to those materials exempted by the Resource Conservation and Recovery Act, 42 U.S.C. 6901 et seq., as amended.



Attachment B  
Legal Description of Facility



- Ⓐ = R - 346.50', L - 152.45'
- Ⓑ = N 25° 25' 40" W - 108.55'
- Ⓒ = N 25° 27' 53" W - 102.17'
- Ⓓ = N 89° 47' 00" E - 226.49'
- Ⓔ = N 00° 13' 00" W - 130.47'
- Ⓕ = N 89° 47' 00" E - 176.33'

BUYER: CIMA Interests, LLC      PROPERTY ADDRESS: 3333, 3329, & 3335 Federal Street

DESCRIBED PROPERTY: A tract or parcel of land containing 3.0794 acres of land, more or less, being out of Lot 149 in ALTA VISTA ACRES, SECTION 2, a subdivision in Harris County, Texas, according to the map or plat thereof, recorded in Volume 9, Page 41, of the Map Records of Harris County, Texas, said tract being more particularly described by metes and bounds as attached.

*H.T. Weber*      *J.B. GVP*



I do hereby certify that this survey was this day made on the ground at the property legally described herein, (or on the records thereof, in correct, and that no error or inaccuracy except as shown, and was done by me or under my supervision, and according to all laws and the current regulations as engaged by the Texas Board of Professional Land Surveying.

*H.T. Weber*

SUBJECT PROPERTY DOES NOT LIE IN A F.I.A. DESIGNATED FLOOD ZONE AS PER FLOOD MAP NO. 480307 0915 J 11-6-96 Zone X

INVOICE #	31943	JOB #	5-696-06
D.F. #	593791-N	DATE	5-30-06

NOTES

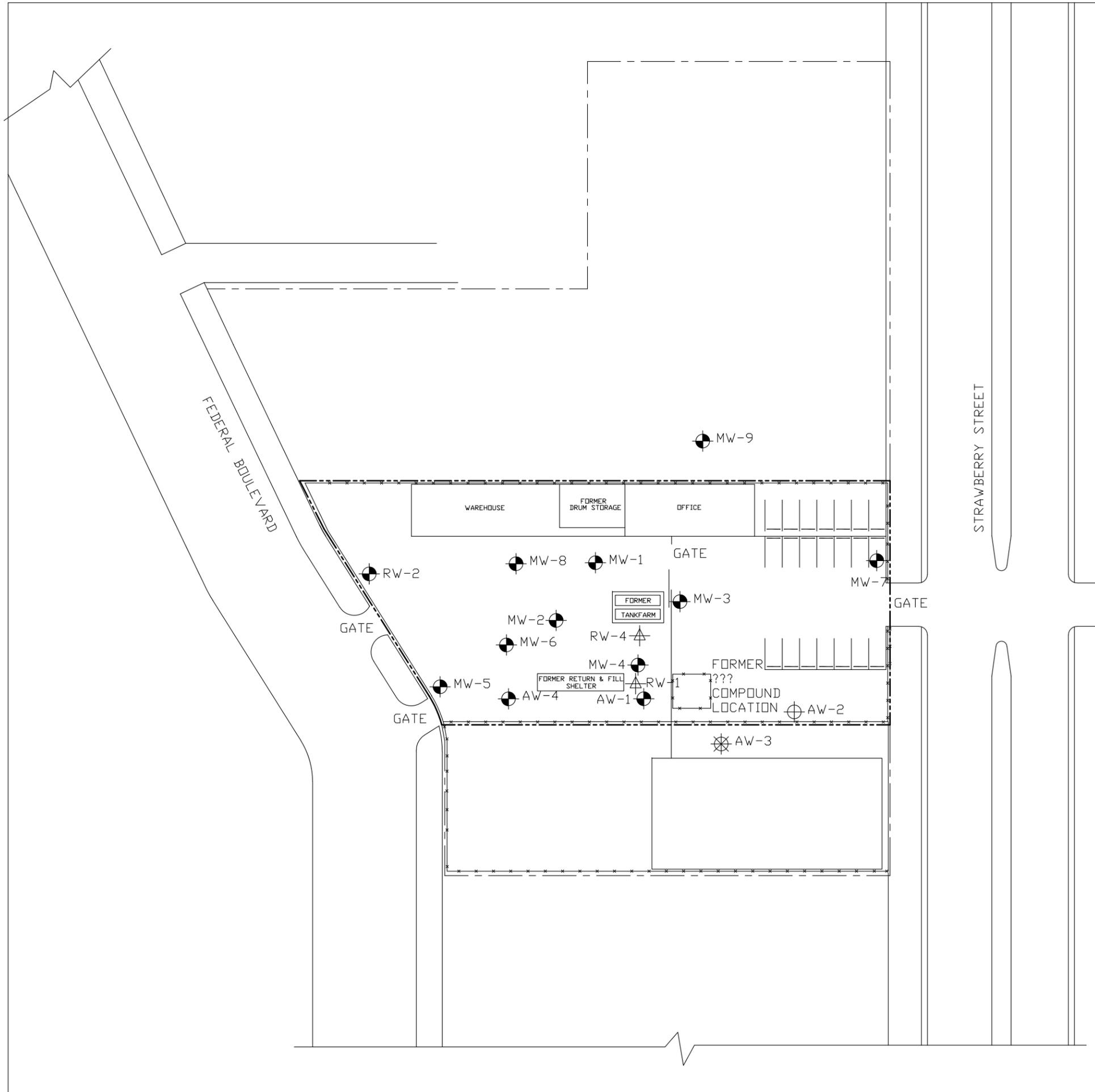
- ALL BEARINGS ARE PER PLAT, O.R.S. OR AS ASSUMED
- THIS SURVEY IS CERTIFIED FOR THIS TRANSACTION ONLY. IT IS NOT TRANSFERABLE TO ADDITIONAL INSTITUTIONS OR SUBSEQUENT OWNERS.
- SUBJECT TO ANY AND ALL RECORDED AND UNRECORDED EASEMENTS.
- FLOOD INFORMATION IS BASED ON GRAPHIC PLOTTING ONLY, DUE TO INHERENT INACCURACIES ON FEMA MAPS. WE CANNOT ASSUME RESPONSIBILITY FOR EXACT DETERMINATION.
- THERE ARE NO NATURAL DRAINAGE COURSES ON THIS PROPERTY.

OFFICE ME      DRAFTING DR      FINAL CHECK

**SURVEY 1, INC.**  
 P. O. BOX 2643 • ALVIN, TX 77512  
 (281) 393-1382 • Fax (281) 393-1383

## Attachment C

### Facility Boundaries and Adjacent Waters Map



LEGEND	
---x---x---	FENCE LINE
-----	FORMER S-K PROPERTY LINE
- - - - -	CIMA INTERESTS PROPERTY LINE
⊕ AW-2	MONITOR WELL (OFF SITE)
⊗ AW-3	PLUGGED MONITOR WELL
⊕ RW-1	RECOVERY WELL
⊕ MW-6	MONITOR WELL (ON SITE)

GENERAL NOTES

PROPRIETARY STATEMENT

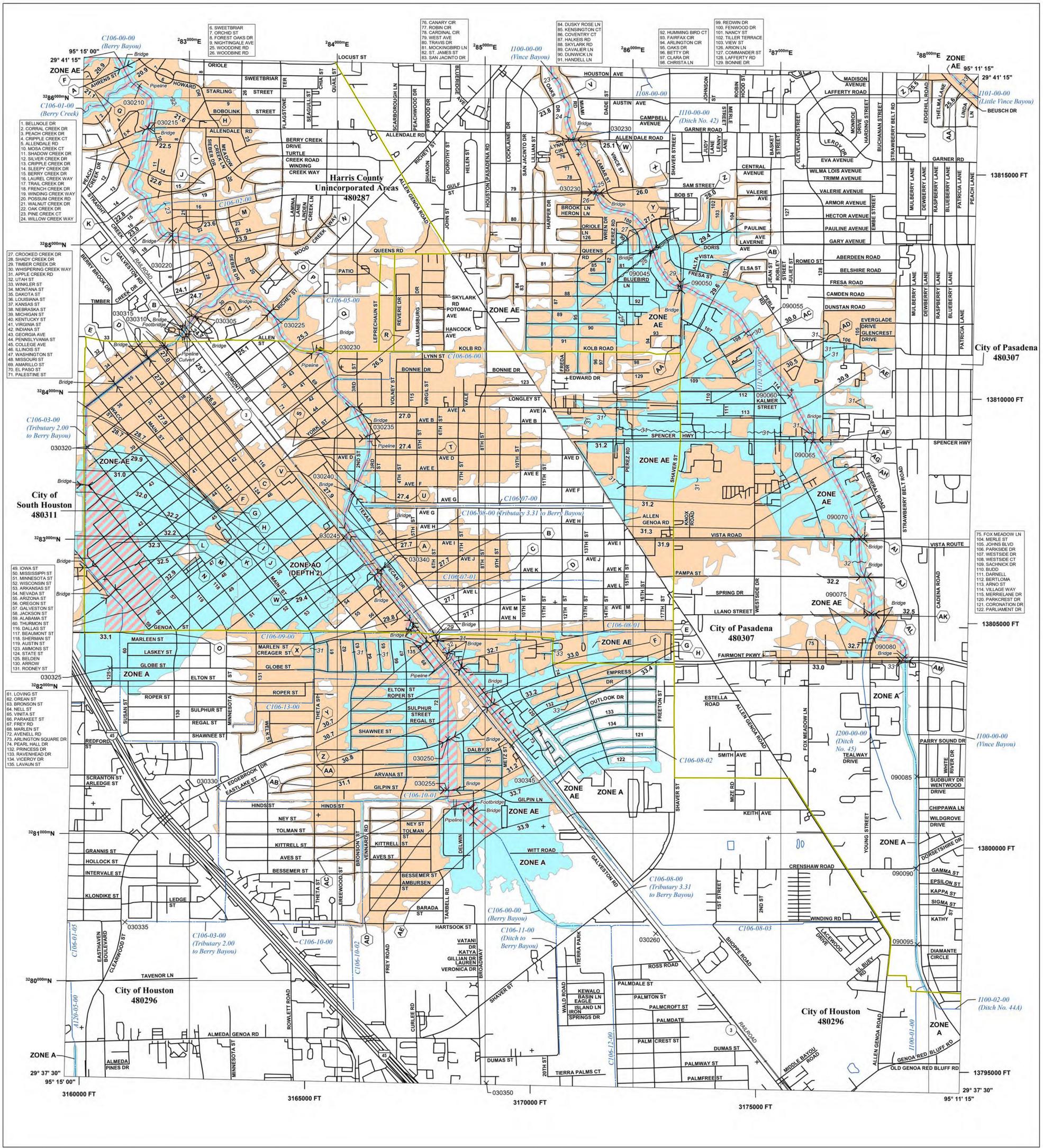
THIS DRAWING IS THE EXCLUSIVE PROPERTY OF SAFETY-KLEEN SYSTEMS, INC. AND IS PROPRIETARY AND CONFIDENTIAL INFORMATION. THIS DRAWING AND THE INFORMATION CONTAINED THEREIN MUST NOT BE DUPLICATED, USED, DIVULGED, REPRODUCED, COPIED, DISCLOSED OR APPROPRIATED IN WHOLE OR IN PART FOR ANY PURPOSE OTHER THAN AS EXPRESSLY AUTHORIZED BY SAFETY-KLEEN SYSTEMS, INC. THIS DRAWING MUST BE RETURNED PROMPTLY UPON REQUEST.

TITLE  
 SITE PLAN  
 3333 FEDERAL RD.  
 PASADENA TX. 77504



NO.	DESCRIPTION	BY	CHK	APPR	DATE
A	NEW ISSUE FOR PERMIT	JEK	JZ	JZ	011226
REVISIONS					

SCALE	BY	CHKD	P.E. APPR	DP. APPR	DATE
1"=30'	JEK	JZ	JZ	JZ	1/12/26
SERVICE CENTER LOCATION					STD-DWG-REV NO.
PASADENA, TX.					7PS-SP00-001



**FLOOD HAZARD INFORMATION**

- SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT  
**THE INFORMATION DEPICTED ON THIS MAP AND SUPPORTING DOCUMENTATION ARE ALSO AVAILABLE IN DIGITAL FORMAT AT [HTTPS://MSC.FEMA.GOV](https://MSC.FEMA.GOV)**
- Without Base Flood Elevation (BFE) Zone A, V, A99
  - With BFE or Depth Zone AE, AO, AH, VE, AR
  - Regulatory Floodway
  - 0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X
  - Future Conditions 1% Annual Chance Flood Hazard Zone X
  - Area with Reduced Flood Risk due to Levee See Notes. Zone X
  - Area with Flood Risk due to Levee Zone D
  - NO SCREEN Area of Minimal Flood Hazard Zone X
  - Area of Undetermined Flood Hazard Zone D
  - Channel, Culvert, or Storm Sewer
  - Levee, Dike, or Floodwall
  - Cross Sections with 1% Annual Chance Water Surface Elevation
  - Coastal Transect
  - Coastal Transect Baseline
  - Profile Baseline
  - Hydrographic Feature
  - Base Flood Elevation Line (BFE)
  - Limit of Study
  - Jurisdiction Boundary

**NOTES TO USERS**

For information and questions about this Flood Insurance Rate Map (FIRM), available products associated with this FIRM, including historic versions, the current map date for each FIRM panel, how to order products, or the National Flood Insurance Program (NFIP) in general, please call the FEMA Map Information eXchange at 1-877-FEMA-MAP (1-877-336-2627) or visit the FEMA Flood Map Service Center website at <https://msc.fema.gov>. Available products may include previously issued Letters of Map Change, a Flood Insurance Study Report, and/or digital versions of the map. Many of these products can be ordered or obtained directly from the website.

Communities annexing land on adjacent FIRM panels must obtain a current copy of the adjacent panel as well as the current FIRM index. These may be ordered directly from the Map Service Center at the number listed above.

For community and countywide map dates refer to the Flood Insurance Study report for this jurisdiction.

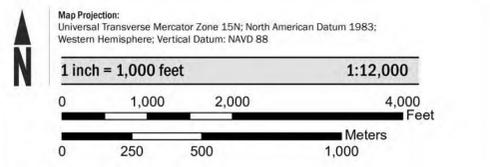
To determine if flood insurance is available in the community, contact your insurance agent or call the National Flood Insurance Program at 1-800-638-6620.

Base map information shown on this FIRM was provided in digital format by the Houston-Galveston Area Council (H-GAC) and was revised and enhanced by Harris County (2015). The Texas Natural Resources Information System (TNRIS) provided the Texas Department of Transportation (TxDOT) community boundaries and transportation layers dated 2015.

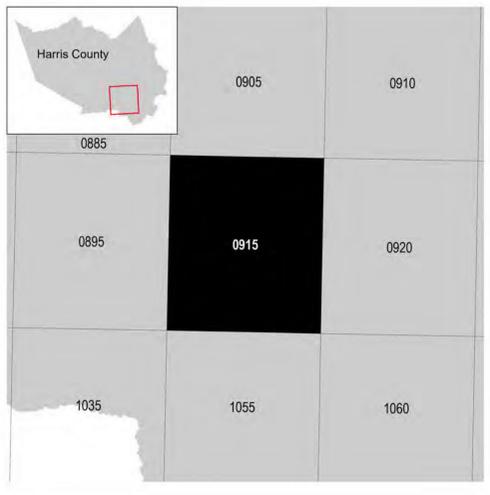
Vertical Datum Adjustment due to subsidence is the 2001 adjustment.

Benchmarks shown on this map were provided by either Harris County or the National Geodetic Survey. To obtain elevation, description, and location information for benchmarks provided by Harris County, please contact the Permits Office of the Engineering Department at 713-274-3900 or visit their website at <https://www.eng.hctx.net/permits>. For information regarding the benchmarks provided by National Geodetic Survey, please contact the Information Services Branch of the National Geodetic Survey at 301-713-3242 or visit the website at <https://www.ngs.noaa.gov>.

**SCALE**



**PANEL LOCATOR**



**National Flood Insurance Program**

**NATIONAL FLOOD INSURANCE PROGRAM**  
**FLOOD INSURANCE RATE MAP**

**HARRIS COUNTY, TEXAS**  
 and Incorporated Areas

PANEL 915 of 1150

Panel Contains:

COMMUNITY	NUMBER	PANEL	SUFFIX
HARRIS COUNTY	480287	0915	N
HOUSTON, CITY OF	480296	0915	N
PASADENA, CITY OF	480307	0915	N
SOUTH HOUSTON, CITY OF	480311	0915	N

FEMA

VERSION NUMBER  
2.3.3.3

MAP NUMBER  
48201C0915N

MAP REVISED  
MAY 2, 2019

# PART B

# Appendix I

## General Information

List of Appendices	
Appendix I.1	Table I – General Information
Appendix I.2	Core Data Form
Appendix I.3	Table I.1 - Description of Proposed Application Changes
Appendix I.4	Signature on Application
Appendix I.5	List and Map of Adjacent Landowners List
Appendix I.6	Plain Language Summary (English)
Appendix I.7	Plain Language Summary (Spanish)

Appendix I  
General Information

**I-1            270.13(a)-(m)    Description of activities conducted which require facility to obtain a permit under RCRA, and brief description of the nature of the business**

Safety-Kleen Systems, Inc. is an international service-oriented company whose customers are primarily engaged in automotive repair, industrial maintenance, and dry cleaning services. The company has been operating since 1968, offering solvent collection and reclamation services for its customers. Safety-Kleen is also a leading provider of parts washer solvents, used oil collection, containerized waste services, vacuum services, total project management, and other environmental services to a wide array of customers in the automotive, metalworking, manufacturing, and other end markets.

The Pasadena Service Center does not have operating hours because it is currently closed. The facility is sited on 0.9 acres.

**I-2, I-3, I-4, I-5            270.13(b)-(g)            Name, Mailing Address, Location of Facility**

Facility Address: 3333 Federal Road  
Pasadena, TX 77504

Facility Telephone Number: 781-792-5000

US EPA Identification Number: TXD 000 747 386

Texas Identification Number: 71143

Geographic Location: 29° 39' 36 N  
95° 11' 35" W

Facility Owner/Operator: Safety-Kleen Systems, Inc.  
42 Longwater Dr.  
Norwell, MA 02061  
781-792-5000

Date Operations Began: 1979

The facility is not located on Indian lands.

This facility is not a new facility. This is a renewal application.

**I-6                    270.13(h)            Requirements for Existing Facilities**

Photographs of the facility are not included in the Part A because the facility has been closed, is undergoing remediation and is currently being operated by a different company. A scale site map drawing is included in Appendix II.2. There are no planned future treatment, storage, and disposal areas.

**I-6, I-7                270.13(i)(j)            Description of Processes to be Used for Treating, Storing, and Disposing of Hazardous Waste; Estimate on Quantity to be Stored**

The facility has requested closure for 2 RCRA Permit exempt – waste waster treatment units.

**Table I: General Information**

**A. Applicant: Facility Operator**

Name <sup>1</sup>	Safety-Kleen Systems, Inc.
Address <sup>2</sup>	3333 Federal Rd
City, State <sup>2</sup>	Pasadena, TX
Zip Code <sup>2</sup>	77504
Telephone Number	
Alternate Telephone Number	
TCEQ Solid Waste Registration No.	71143
EPA I.D. No.	TXD000747386
Permit No.	50260
County	Harris
Regulated Entity Name	Safety-Kleen Systems
Regulated Entity Reference Number (RN)	RN100591197
Customer Name <sup>2</sup>	Safety-Kleen Systems Inc
Customer Reference Number:	CN600128128
Charter Number <sup>3</sup>	2930806
Previous or Former Names of the Facility (if applicable)	

**B. Facility Owner: Identify the Facility Owner if different than the Facility Operator<sup>4</sup>**

Same as Facility Operator?

Name	CIMA Interests LLC
Address	3333 Federal Rd
City, State	Pasadena, TX
Zip Code	77504
Telephone Number	
Alternate Telephone Number	

**C. Facility Contact**

**1. Persons or firms who will act as primary contact:**

Name, Title:	Ricardo Saucedo, Sr. Environmental Compliance Mgr
Address	5243 Sinclair Road
City, State:	San Antonio, Texas
Zip Code	78222
Telephone Number	210-241-2619
Alternate Telephone Number	
E-mail	[REDACTED]

**Persons or firms who will act as primary contact (if more than one):**

Name, Title:	N/A
Address	
City, State:	
Zip Code	
Telephone Number	
Alternate Telephone Number	
E-mail	

**2. Agent in Service or Agent of Service (if you are an out-of-state company)<sup>5</sup>:**

Name, Title:	N/A
Address	
City, State:	
Zip Code	

**3. Individual responsible for causing notice to be published:**

Name:	Jessica Zebre
Address	5243 Sinclair Road
City, State:	San Antonio, Texas
Zip Code	78222
Telephone Number	308-241-0889
Alternate Telephone Number	
E-mail	[REDACTED]

**4. Public place in county where application will be made available<sup>6</sup>:**

Name	Pasadena Fairmont Library
Address	4330 Fairmont Pkwy
City, State	Pasadena, TX
Zip Code	77504

### D. Application Type and Facility Status

#### 1. Application Type

- |   |   |   |
|---|---|---|
| <input checked="" type="checkbox"/> Permit          | <input checked="" type="checkbox"/> Amendment | <input type="checkbox"/> Modification         |
| <input type="checkbox"/> New                        | <input type="checkbox"/> Major                | <input type="checkbox"/> Class 3              |
| <input checked="" type="checkbox"/> Renewal         | <input checked="" type="checkbox"/> Minor     | <input type="checkbox"/> Class 2              |
| <input type="checkbox"/> Interim Status             |   | <input type="checkbox"/> Class 1 <sup>1</sup> |
| <input checked="" type="checkbox"/> Compliance Plan |   | <input type="checkbox"/> Class 1              |
| <input type="checkbox"/> RD&D                       |   |   |

2. Part of a Consolidated Permit Processing request? [30 TAC Chapter 33]

3. Does the application contain confidential material?<sup>7</sup>

#### 4. Facility Status. Check all that apply

- |  |  |
|--|--|
| <input type="checkbox"/> Proposed            | <input type="checkbox"/> On-Site                     |
| <input checked="" type="checkbox"/> Existing | <input type="checkbox"/> Off-site                    |
|  | <input type="checkbox"/> Commercial                  |
|  | <input type="checkbox"/> Recycle                     |
|  | <input type="checkbox"/> Land Disposal               |
|  | <input type="checkbox"/> Areal or capacity expansion |
|  | <input checked="" type="checkbox"/> Compliance plan  |

5. Is the facility within the Coastal Management Program boundary?

#### 6. Description of Application Changes

Complete Table I.1 - Description of Proposed Application Changes

**Note: List all changes requested in Table. Unlisted requests risk remaining unaddressed or possibly denied if brought to the permit application reviewer's attention at a later time.**

7. Total acreage of the facility being permitted:

**8. Identify the name of the drainage basin and segment where the facility is located<sup>8</sup>**

River Segment

River Basin

**E. Facility Siting Summary:**

Is the facility located or proposed to be located:

1. Within a 100-year floodplain?	No
2. in wetlands?	No
3. In the critical habitat of an endangered species of plant or animal?	No
4. On the recharge zone of a sole-source aquifer?	No
5. In an area overlying a regional aquifer?	Yes
6. Withing 0.5 mile (2,640 feet) of an established residence, church, school , day care center, surface water body used for public drinking water supply, or dedicated public park? <sup>9</sup> [30 TAC 335.202] If Yes: the TCEQ shall not issue a permit for this facility.	No
7. In an area in which the governing body of the country or municipality has prohibited the processing or disposal of municipal hazardous waste or industrial solid waste? If yes: provide a copy of the ordinance or order.	No

**F. Wastewater and Stormwater Disposition**

1. Is the disposal of any waste to be accomplished by a waste disposal well at this facility?

If Yes: List WDW Permit No(s):

2. Will any point source discharge of effluent or rainfall runoff occur as a result of the proposed activities?

3. If Yes, is this discharge regulated by a TPDES or TCEQ permit?  Yes

TCEQ Permit No.

TPDES Permit No.

No

Date TCEQ discharge permit application filed:

Date TPDES discharge application filed:

**G. Information Required to Provide Notice**

State Officials List [30 TAC 39]

State Senator

Name:	The Honorable Carol Alvarado
Address	PO Box 12068, Capitol Station
City, State:	Austin, TX
Zip Code:	78711

State Representative

Name:	Representative Mary Ann Perez
Address	PO Box 12910, Room 1N.7
City, State:	Austin, TX
Zip Code	78711

Local Officials List [30 TAC 39]

Mayor

Name:	Mayor Thomas Schoenbein
Address	1149 Ellsworth Dr.
City, State:	Pasadena, TX
Zip Code	77506

Local Health Authority

Name:	Pasadena Health Department Kathy Perez-Ashton
Address	1149 Ellsworth Drive
City, State:	Pasadena, TX
Zip Code	77506

County Judge

Name:	Judge Lina Hidalgo
Address	1001 Preston Street, Suite 910
City, State:	Houston, TX
Zip Code	77002

County Health Authority

Name:	Harris County Public Health Leah Barton
Address	1111 Fannin Street
City, State:	Houston, TX
Zip Code	77002

Based on the questions in the Bilingual Notice Instructions for this form, are you required to make alternate (Bilingual) notice for this application?

No

Bilingual Language(s):

TCEQ Core Data Form Submitted?(Required)

Yes

Has any information changed on the TCEQ Core Data Form since the last submittal?

No

Signature on Application Submitted?  
(see Section I Instructions, Item c)

Yes

1. Individual, Corporation, or Other Legal Entity Name on the Permit - must match the Secretary of State's database records for the Facility).
2. The legal name and address must match the Core Data Form.
3. If the application is submitted on behalf of a corporation, please identify the Charter Number as recorded with the Office of the Secretary of State for Texas.
4. The operator has the duty to submit an application if the facility is owned by one person and operated by another [30 TAC 305.43(b)]. The permit will specify the operator and the owner who is listed on Part A of this application [Section 361.087, Texas Health and Safety Code].
5. If the application is submitted by a corporation or by a person residing out of state, the applicant register an Agent in Service or Agent of Service with the Texas Secretary of State's office and provide a complete mailing address for the agent. The agent must be a Texas resident.
6. For applications for new permits, renewals, major amendments and Class 3 modifications a copy of the administratively complete application must be made available at a public place in the county where the facility is, or will be, located for review and copying by the public. Identify the public place in the county (e.g., public library, county court house, city hall), including the address, where the application will be made available for review and copying by the public.
7. For confidential information cross-reference the confidential material throughout the application to Section XIII: Confidential Material, and submit as a separate Section XIII document or binder conspicuously marked "CONFIDENTIAL".
8. Use the segments line map created by [TCEQ GIS Team](#) to find the Segment Name and Basin Name.
9. Use only for a new commercial hazardous waste management facility or areal expansion of an existing hazardous waste management facility or unit of that facility as defined in 30 TAC 335.202.



# TCEQ Core Data Form

For detailed instructions on completing this form, please read the Core Data Form Instructions or call 512-239-5175.

## SECTION I: General Information

<b>1. Reason for Submission</b> (If other is checked please describe in space provided.)		
<input type="checkbox"/> New Permit, Registration or Authorization (Core Data Form should be submitted with the program application.)		
<input checked="" type="checkbox"/> Renewal (Core Data Form should be submitted with the renewal form)	<input type="checkbox"/> Other	
<b>2. Customer Reference Number</b> (if issued)	<a href="#">Follow this link to search for CN or RN numbers in Central Registry**</a>	<b>3. Regulated Entity Reference Number</b> (if issued)
CN 600128128		RN 100591197

## SECTION II: Customer Information

<b>4. General Customer Information</b>		<b>5. Effective Date for Customer Information Updates</b> (mm/dd/yyyy)		2-2-2026	
<input type="checkbox"/> New Customer		<input checked="" type="checkbox"/> Update to Customer Information		<input type="checkbox"/> Change in Regulated Entity Ownership	
<input type="checkbox"/> Change in Legal Name (Verifiable with the Texas Secretary of State or Texas Comptroller of Public Accounts)					
<i>The Customer Name submitted here may be updated automatically based on what is current and active with the Texas Secretary of State (SOS) or Texas Comptroller of Public Accounts (CPA).</i>					
<b>6. Customer Legal Name</b> (If an individual, print last name first: eg: Doe, John)				<i>If new Customer, enter previous Customer below:</i>	
Safety-Kleen Systems, Inc.					
<b>7. TX SOS/CPA Filing Number</b>		<b>8. TX State Tax ID</b> (11 digits)		<b>9. Federal Tax ID</b>	
0002930806		1260900192		(9 digits) 39-6090019	
<b>10. DUNS Number</b> (if applicable) 05-397-6551					
<b>11. Type of Customer:</b>		<input checked="" type="checkbox"/> Corporation		<input type="checkbox"/> Individual	
Government: <input type="checkbox"/> City <input type="checkbox"/> County <input type="checkbox"/> Federal <input type="checkbox"/> Local <input type="checkbox"/> State <input type="checkbox"/> Other		<input type="checkbox"/> Sole Proprietorship		Partnership: <input type="checkbox"/> General <input type="checkbox"/> Limited	
<b>12. Number of Employees</b>				<b>13. Independently Owned and Operated?</b>	
<input type="checkbox"/> 0-20 <input type="checkbox"/> 21-100 <input type="checkbox"/> 101-250 <input type="checkbox"/> 251-500 <input checked="" type="checkbox"/> 501 and higher				<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<b>14. Customer Role</b> (Proposed or Actual) – as it relates to the Regulated Entity listed on this form. Please check one of the following					
<input type="checkbox"/> Owner		<input checked="" type="checkbox"/> Operator		<input type="checkbox"/> Owner & Operator	
<input type="checkbox"/> Occupational Licensee		<input type="checkbox"/> Responsible Party		<input type="checkbox"/> VCP/BSA Applicant	
<input type="checkbox"/> Other:					
<b>15. Mailing Address:</b>		Safety-Kleen Systems, Inc.			
		5243 Sinclair Road			
<b>City</b>		<b>State</b>		<b>ZIP</b>	
San Antonio		TX		78222	
				<b>ZIP + 4</b>	
<b>16. Country Mailing Information</b> (if outside USA)				<b>17. E-Mail Address</b> (if applicable)	
				[REDACTED]	

<b>18. Telephone Number</b>	<b>19. Extension or Code</b>	<b>20. Fax Number (if applicable)</b>
( 210 ) 241-2619		( ) -

### SECTION III: Regulated Entity Information

<b>21. General Regulated Entity Information</b> (If 'New Regulated Entity' is selected, a new permit application is also required.)								
<input type="checkbox"/> New Regulated Entity <input type="checkbox"/> Update to Regulated Entity Name <input checked="" type="checkbox"/> Update to Regulated Entity Information								
<i>The Regulated Entity Name submitted may be updated, in order to meet TCEQ Core Data Standards (removal of organizational endings such as Inc, LP, or LLC).</i>								
<b>22. Regulated Entity Name</b> (Enter name of the site where the regulated action is taking place.)								
Safety-Kleen Systems								
<b>23. Street Address of the Regulated Entity:</b>  (No PO Boxes)	3333 Federal Rd							
	<b>City</b>	Pasadena	<b>State</b>	TX	<b>ZIP</b>	77504	<b>ZIP + 4</b>	1737
<b>24. County</b>								

If no Street Address is provided, fields 25-28 are required.

<b>25. Description to Physical Location:</b>											
<b>26. Nearest City</b>							<b>State</b>	<b>Nearest ZIP Code</b>			
<i>Latitude/Longitude are required and may be added/updated to meet TCEQ Core Data Standards. (Geocoding of the Physical Address may be used to supply coordinates where none have been provided or to gain accuracy).</i>											
<b>27. Latitude (N) In Decimal:</b>			27.694556			<b>28. Longitude (W) In Decimal:</b>			97.418556		
Degrees	Minutes		Seconds			Degrees	Minutes		Seconds		
27	41		40.4			97	25		06.8		
<b>29. Primary SIC Code</b>			<b>30. Secondary SIC Code</b>			<b>31. Primary NAICS Code</b>			<b>32. Secondary NAICS Code</b>		
(4 digits)			(4 digits)			(5 or 6 digits)			(5 or 6 digits)		
0						N/A					
<b>33. What is the Primary Business of this entity?</b> (Do not repeat the SIC or NAICS description.)											
The facility is closed.											
<b>34. Mailing Address:</b>	Safety-Kleen Systems, Inc.										
	5243 Sinclair Rd										
<b>City</b>	San Antonio	<b>State</b>	TX	<b>ZIP</b>	78222	<b>ZIP + 4</b>					
<b>35. E-Mail Address:</b>	[REDACTED]										
<b>36. Telephone Number</b>			<b>37. Extension or Code</b>			<b>38. Fax Number (if applicable)</b>					
( 210 ) 241-2619						( ) -					

**39. TCEQ Programs and ID Numbers** Check all Programs and write in the permits/registration numbers that will be affected by the updates submitted on this form. See the Core Data Form instructions for additional guidance.

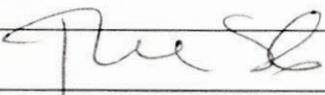
<input type="checkbox"/> Dam Safety	<input type="checkbox"/> Districts	<input type="checkbox"/> Edwards Aquifer	<input type="checkbox"/> Emissions Inventory Air	<input checked="" type="checkbox"/> Industrial Hazardous Waste
				HW-50260, SW Reg No. 77143
<input type="checkbox"/> Municipal Solid Waste	<input type="checkbox"/> New Source Review Air	<input type="checkbox"/> OSSF	<input type="checkbox"/> Petroleum Storage Tank	<input type="checkbox"/> PWS
<input type="checkbox"/> Sludge	<input type="checkbox"/> Storm Water	<input type="checkbox"/> Title V Air	<input type="checkbox"/> Tires	<input type="checkbox"/> Used Oil
<input type="checkbox"/> Voluntary Cleanup	<input type="checkbox"/> Wastewater	<input type="checkbox"/> Wastewater Agriculture	<input type="checkbox"/> Water Rights	<input type="checkbox"/> Other:

**SECTION IV: Preparer Information**

<b>40. Name:</b>	Jessica Zebre	<b>41. Title:</b>	Sr. Environmental Compliance Mgr
<b>42. Telephone Number</b>	<b>43. Ext./Code</b>	<b>44. Fax Number</b>	<b>45. E-Mail Address</b>
( 308 ) 241-0889		( ) -	

**SECTION V: Authorized Signature**

46. By my signature below, I certify, to the best of my knowledge, that the information provided in this form is true and complete, and that I have signature authority to submit this form on behalf of the entity specified in Section II, Field 6 and/or as required for the updates to the ID numbers identified in field 39.

<b>Company:</b>	Safety-Kleen Systems, Inc.	<b>Job Title:</b>	Sr. Environmental Compliance Manager
<b>Name (In Print):</b>	Ricardo Saucedo	<b>Phone:</b>	( 210 ) 241- 2619
<b>Signature:</b>		<b>Date:</b>	1/24/2026

**Table I.1-Description of Proposed Application Changes**

Permit/Compliance Plan Application Appendix/Section	Brief Description of Proposed Change	Modification or Amendment Type	Supporting Regulatory Citation
General Application	Admin updates	Minor	N/A

**Signature Page**

I, Ricardo Saucedo, Sr. Environmental Compliance Mgr,  
(Operator) (Title)

certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: [Signature] Date: 02/06/2026

**To be completed by the Operator if the application is signed by an Authorized Representative for the Operator**

I, N/A, hereby designate N/A  
[Print or Type Name] [Print or Type Name]

as my representative and hereby authorize said representative to sign any application, submit additional information as may be requested by the Commission; and/or appear for me at any hearing or before the Texas Commission on Environmental Quality in conjunction with this request for a Texas Water Code or Texas Solid Waste Disposal Act permit. I further understand that I am responsible for the contents of this application, for oral statements given by my authorized representative in support of the application, and for compliance with the terms and conditions of any permit which might be issued based upon this application.

N/A  
Printed or Typed Name of Operator or Principal Executive Officer  
N/A  
Signature

SUBSCRIBED AND SWORN to before me by the said Ricardo T. Saucedo, Operator

On this 6<sup>th</sup> day of February, 2026

My commission expires on the 22<sup>nd</sup> day of December, 2029

Notary Public in and for Bexar County, Texas

[Note: Application Must Bear Signature & Seal of Notary Public]

Maddison Okamura



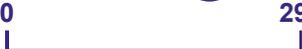
# Account Detail HCAD\_Map

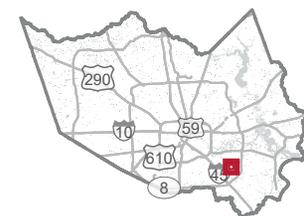


HARRIS CENTRAL  
APPAISAL DISTRICT  
13013 Northwest Fwy  
Houston, TX 77040  
<https://hcad.org/>

 Parcels



0  290 US Feet



Geospatial or map data maintained by the Harris Central Appraisal District is for informational purposes and may **not** have been prepared for or be suitable for legal, engineering, or surveying purposes. It does **not** represent an on-the-ground survey and only represents the approximate location of property boundaries.

Date: 1/12/2026; File: / Letter Landscape Side



### Appendix I.5 List and Map of Adjacent Landowners List

Lot. No.	Owner
A	JOE R & NARCISA I DULANY 1203 KENWICK PL. PASADENA, TX. 77504
B	YOLANDA DE HOYOS 3327 FEDERAL RD. PASADENA, TX. 77504
C	LUIS C JORGE 3415 FEDERAL RD. PASADENA, TX. 77504
D	JAMES E MCEVILLY 3417 FEDERAL RD. PASADENA,, TX. 77504
E	BRYAN & TERESA AARON GLENN GEDDES 10006 OLD ORCHARD LAPORTE, TX. 77571
F	TOWN HOMES AT VISTA LLC 3420 FEDERAL RD. PASADENA, TX. 77504
G	PREVAILING FAITH CHURCH 912 WESTFALL AVE. PASADENA, TX. 77506
H	GBT STRAWBERRY LLC 3334 STRAWBERRY RD. PASADENA, TX. 77504
I	LD ENERGY PROP. LLC P.O. BOX 3429 EL SEGUNDO, CA. 90245
J	GBT STRAWBERRY LLC 3334 STRAWBERRY RD. PASADENA, TX. 77504



Texas Commission on Environmental Quality  
**Plain Language Summary**

**Industrial and Hazardous Waste Permit Applications**

**Instructions:** Complete this form and submit with any industrial hazardous waste, or industrial solid waste, permit application that is subject to 30 Texas Administrative Code [§39.405\(k\)](#) [applications for a Class 3 permit modification, permit amendment, permit renewals, and for a new permit]. Please be concise.

Application Information	
<b>Purpose of application:</b> <input type="checkbox"/> New <input checked="" type="checkbox"/> Renewal <input type="checkbox"/> Modification/Amendment	
<b>Date Submitted to TCEQ:</b> 2-2-2026	
<b>Customer Name:</b> Safety-Kleen Systems	
<b>Facility Name:</b> Safety-Kleen Systems, Inc.	
<b>CN:</b> CN600128128	<b>RN:</b> 100591197
<b>Permit Number:</b> 50260	<b>Solid Waste Registration Number:</b> 71143
<b>Facility Street Address:</b> 3333 Federal Rd, Pasadena, TX 77504	
<b>Weblink to Street Address:</b> <a href="https://www.google.com/maps/place/3333+Federal+Rd,+Pasadena,+TX+77504">https://www.google.com/maps/place/3333+Federal+Rd,+Pasadena,+TX+77504</a>	
Facility Information <i>(check all that apply)</i>	
<b>What is the primary type of business?</b>	<input type="checkbox"/> Chemical manufacturing <input type="checkbox"/> Oil refinery <input type="checkbox"/> Treatment, storage or disposal facility plant <input checked="" type="checkbox"/> Other <b>If other, enter description:</b> Closed Facility
<b>What does the facility produce?</b>	<input type="checkbox"/> Chemicals <input type="checkbox"/> Fuels / lubricants <input type="checkbox"/> No products <input checked="" type="checkbox"/> Other <b>If other, enter description:</b> Closed Facility
Waste Management Information <i>(check all that apply)</i>	
<b>What types of wastes are managed?</b>	<input checked="" type="checkbox"/> Nonhazardous industrial <input type="checkbox"/> Hazardous <input type="checkbox"/> Other <b>If other, enter description:</b>
<b>Where does the waste come from?</b>	<input type="checkbox"/> Off-site source <input checked="" type="checkbox"/> On-site source
<b>How is the waste managed?</b>	<input type="checkbox"/> Storage <input type="checkbox"/> Process / Treatment <input type="checkbox"/> Disposal <input checked="" type="checkbox"/> Other <b>If other, enter description:</b> Off-site disposal
<b>What type of units manage the waste?</b>	<input type="checkbox"/> Active <input type="checkbox"/> Post-Closure <b>Type and count:</b> Satellite Accumulation Area
<b>What happens to waste managed at the facility?</b>	<input checked="" type="checkbox"/> Transported off-site <input type="checkbox"/> Disposed on-site <input type="checkbox"/> Other <b>If other, enter description:</b>

<b>Pollution Control Methods</b> <i>(check all that apply)</i>	
<b>How will the facility prevent spills, leaks, and releases?</b>	<input type="checkbox"/> Routine inspections <input type="checkbox"/> Engineered liner systems <input type="checkbox"/> Spill containment <input type="checkbox"/> Proper waste handling <input type="checkbox"/> Operations in enclosed buildings <input type="checkbox"/> Groundwater monitoring <input checked="" type="checkbox"/> Other <b>If other, enter description:</b> Closed Facility
<b>How will the facility clean up spills, leaks, and releases?</b>	<input type="checkbox"/> Spill clean-up supplies <input type="checkbox"/> Decontamination equipment <input checked="" type="checkbox"/> Other <b>If other, enter description:</b> Closed Facility
<b>How will the facility prevent / minimize air emissions?</b>	<input type="checkbox"/> Air monitoring / control systems <input type="checkbox"/> Filters / scrubbers <input type="checkbox"/> Routine inspections <input type="checkbox"/> Proper waste handling <input type="checkbox"/> Operations in enclosed buildings <input checked="" type="checkbox"/> Other <b>If other, enter description:</b> Closed Facility

**Description of Update** *(for Class 3 Modifications and Amendments only)*

List and explain any changes this modification or amendment would make to the two sections above—**Waste Management Information** and **Pollution Control Methods**.

**Clear Form**



# Resumen en Lenguaje Sencillo

## Solicitudes de Permisos de Desechos Industriales y Peligrosos

### Instrucciones

Complete este formulario y envíe con cualquier solicitud de permiso de desechos industriales peligrosos, o desechos sólidos industriales, que esté sujeta al Código Administrativo [de Texas 30 §39.405 \(k\)](#) [es decir, solicitudes para una modificación de permiso de Clase 3, enmienda de permiso, renovaciones de permisos y para un nuevo permiso].

**Sea conciso: toda la información debe caber en dos páginas.**

### Información de la Solicitud

**Propósito de la solicitud:** Nuevo Renovación Modificación/Enmienda

**Sometido a TCEQ:** 2/2/2026

**Nombre del Cliente:** Safety-Kleen Systems

**Nombre de la Instalación:** Safety-Kleen Systems

**CN:** CN600128128

**RN:**100591197

**Número de Permiso:**50260

**Número de Registro de Desechos Sólidos:** 71143

**Dirección de la Instalación:** 3333 Federal Rd, Pasadena, TX 77504

**Enlace Web a la Dirección Postal:**

<https://www.google.com/maps/place/3333+Federal+Rd,+Pasadena,+TX+77504>

### Información de la Instalación *(marque todas lo que correspondan)*

**¿Cuál es el tipo principal de negocio?** Planta de manufactura química Refinería de aceite Instalación de tratamiento, almacenamiento o eliminación Otro **Si es otro, introduzca la descripción:** Facilidad cerrada

**¿Qué produce la instalación?** Químicos Combustibles / lubricantes Sin productos Otro **Si es otro, introduzca la descripción:** Introduzca la descripción

### Información sobre la Gestión de Desechos *(marque todas las que correspondan)*

**¿Qué tipos de desechos se gestionan?** Industrial no peligroso Peligroso Otro **Si es otro, introduzca la descripción:** Introduzca la descripción

**¿De dónde provienen los desechos?** Fuente externa Fuente interna

**¿Cómo se gestionan los desechos?** Almacenar Procesar / Tratar Eliminación Otro **Si es otro, introduzca la descripción:** Se les da dispocision externa

<b>¿Qué tipo de unidades gestionan los desechos?</b>	<input type="checkbox"/> Activo <input type="checkbox"/> Postcierre <b>Teclee y cuente:</b> Area Satellite de Acumulacion
<b>¿Qué sucede con los desechos gestionados en la instalación?</b>	<input checked="" type="checkbox"/> Transportados fuera del sitio <input type="checkbox"/> Eliminado en el sitio <input type="checkbox"/> Otro <b>Si es otro, introduzca la descripción:</b> Introduzca la descripción

<b>Métodos de Control de la Contaminación</b> <i>(marque todos los que correspondan)</i>	
<b>¿Cómo evitará la instalación derrames, fugas y liberaciones?</b>	<input type="checkbox"/> Inspecciones de Rutina <input type="checkbox"/> Sistemas de revestimiento de ingeniería <input type="checkbox"/> Contención de derrames <input type="checkbox"/> Manejo adecuado de desechos <input type="checkbox"/> Operaciones en edificios cerrados <input type="checkbox"/> Monitoreo de aguas subterráneas <input checked="" type="checkbox"/> Otro <b>Si es otro, introduzca la descripción:</b> Facilidad cerrada
<b>¿Cómo limpiará la instalación los derrames, fugas y liberaciones?</b>	<input type="checkbox"/> Suministros de limpieza de derrames <input type="checkbox"/> Equipos de descontaminación <input checked="" type="checkbox"/> Otro <b>Si es otro, introduzca la descripción:</b> Facilidad cerrada
<b>¿Cómo evitará / minimizará la instalación las emisiones atmosféricas?</b>	<input type="checkbox"/> Sistemas de monitoreo / control de aire <input type="checkbox"/> Filtros / depuradores <input type="checkbox"/> Inspecciones de rutina <input type="checkbox"/> Manejo adecuado de desechos <input type="checkbox"/> Operaciones en edificios cerrados <input checked="" type="checkbox"/> Otro <b>Si es otro, introduzca la descripción:</b> Facilidad cerrada

<b>Descripción de la Actualización</b> <i>(solo para Modificaciones y Enmiendas de Clase 3)</i>
<p>Liste y explique cualquier cambio que esta modificación o enmienda haría a las dos secciones anteriores: <b>Información de Gestión de Desechos</b> y <b>Métodos de Control de la Contaminación</b>.  Introduzca una descripción concisa</p>

## Appendix II

### Facility Siting Information

List of Appendices	
Appendix II.1	Table II – Facility Siting Criteria Information
Appendix II.2	Existing Site Plan
Appendix II.3	Topographic Map
Appendix II.4	Flood Plain Map
Appendix II.5	Wind Rose

Appendix II  
Facility Siting Information

**II-1            270.14(b)(1)            General Description**

This facility is currently closed. The facility has no land disposal units, injection or withdrawal wells, surface impoundments, or waste.

The Pasadena Service Center began operations as a storage facility in 1979. The facility is located at 3333 Federal, approximately three miles northeast of Ellington Air Force Base and a quarter mile south of the Spender Highway. The city of Pasadena, Texas is a non-zoned municipality. To the best of Safety-Kleen's knowledge, there are no easements or title, deed, or usage restrictions that may be in conflict with the operations at this site.

Harris County covers approximately 1,777 square miles. The County has a population of over 5.1 million (2025). Houston is the largest city in Harris County.

The climate of the Pasadena area is humid subtropical. The average summer temperature is 87°F, while the average winter temperature is 63°F. Annual rainfall averages approximately 45 inches.

The Safety-Kleen facility, is about 50 feet above sea level.

The facility is above the 100 year flood plain. The site is not or near a critical habitat and no schools, parks or wetlands exist within one quarter mile.

**270.14(b)(8)(i)            Description of Procedures, Structures or Equipment Used to Prevent Hazards in Unloading Operations.**

This section is not applicable because there are no hazardous waste management activities at the site due to the facility currently being closed.

**270.14(b)(8)(ii)            Description of Procedures, Structures, or Equipment Used to Prevent Runoff From Hazardous Waste Handling Areas or to Prevent Flooding**

This section is not applicable because there are no hazardous waste management activities at the site due to the facility currently being closed.

**270.14(b)(8)(iii) Description of Procedures, Structures, or Equipment Used to Prevent Contamination of Water Supplies**

This section is not applicable because there are no hazardous waste management activities at the site due to the facility currently being closed.

**270.14(b)(8)(iv) Description of Procedures, Structures, or Equipment Used to Mitigate Effects of Equipment Failure of Power Outages.**

This section is not applicable because there are no hazardous waste management activities at the site due to the facility currently being closed.

**270.14(b)(8)(v) Description of Procedures, Structures, or Equipment Used to Prevent Undue Exposure of Personnel.**

This section is not applicable because there are no personnel at the site due to the site currently being closed.

**270.14(b)(8)(vi) Description of Procedures, Structures, or Equipment Used to Prevent Releases to the Atmosphere.**

This section is not applicable because there are no hazardous waste management activities at the site due to the facility currently being closed.

**II-2 270.14(b)(19)(i) Topographic Map**

A topographic map indicating 1 mile radius around the facility is included in Appendix II.3. The map shows scale and date.

**II-2a 270.14(b)(19)(ii) The 100-Year Flood Plain Area**

The facility is not located within a 100-year flood plain. This would indicate there is little risk of flooding at the facility. For this reason, there are no flood control barriers. A Federal Flood Insurance Program Map (FIRM) prepared by the Federal Emergency Management Agency (FEMA) is provided in Appendix II.4.

**II-2a 270.14(b)(19)(iii) Surface Waters**

There are no surface waters or intermittent streams located within the facility. Refer to Appendix II.4.

**II-2a 270.14(b)(19)(iv) Surrounding Land Use**

The site is not in or near critical habitat and no schools, parks, oil or gas wells exist within one quarter mile.

**II-2a 270.14(b)(19)(v),(vi) Wind Rose**

Appendix II.5 includes a wind rose plot for the Houston Intercontinental Airport located approximately 24 miles northwest of the site.

**II-2a 270.14(b)(19)(vii) Legal Boundaries**

Legal boundaries of the facility are shown Attachment II.2.

**II-2a 270.14(b)(19)(viii) Access Control**

The facility is currently closed.

**II-2a 270.14(b)(19)(ix) Injection and Withdrawal Wells (On Site and Off Site)**

There are no injection or withdrawal wells on- or off-site.

**II-2a 270.14(b)(19)(x) Buildings and Other Structures**

This section is not applicable because there are no hazardous waste management activities at the site due to the facility currently undergoing closure.

**II-2a 270.14(b)(19)(xi) Drainage and Flood Control Barriers**

The facility is not located in a 100-year flood plain so there are no barriers for drainage or flood control.

**II-2a 270.14(b)(19)(xii) Location of Treatment, Disposal Units and Decontamination Areas**

A site plan with the inactive TCEQ permitted hazardous waste storage areas indicated is included in Appendix II.2 and Appendix II.9.

**II-2b          270.14(c)(2)-(4)          *Additional information on the Topographical Map for Land Disposal Facilities***

The facility does not land dispose of any wastes. Therefore, these sections do not apply.

**II-3          270.14(b)(11)          *Facility Location Information***

This section applies to proposed or new facility construction. Therefore, these sections do not apply.

**II-3a          270.14(b)(11)(i)(ii)          *Seismic Requirements***  
**264.18(a)**

This section applies to proposed or new facility construction; nor is the facility in an area of seismic activity. Therefore, these sections do not apply.

**II-3b          270.14(b)(11)(iii)(iv)(v)          *Flood Plain Requirements***  
**II-3b(1)-(a)          264.18(b)(ii)**

Refer to Section II-3. The facility is not located within a floodplain. Therefore, these sections do not apply.

**II-3c          270.14(b)(10)          *Traffic Pattern***

This section is not applicable because there is no traffic at the site due to the facility currently being closed.

**Table II**

Table II contains the following: Table II.A, Table II.B, Table II.C, Table II.D, Table II.E and Flooding from Section II. F of the Part B Application

**Table II.A - Requirements for Storage or Processing Facilities, Land Treatment Facilities, Waste Piles, Storage Surface Impoundments, and Landfills**

Is the facility located or proposed to be located<sup>1</sup>:

In wetlands? [as applicable: 30 TAC 335.204(a)(2), (b)(2), (c)(2), (d)(2), and/or (e)(2)]	No
<b>If Yes:</b> the TCEQ shall not issue a permit for a new hazardous waste management facility or areal expansion of an existing facility into wetlands, pursuant to 30 TAC 335.205(a)(1).	
In the critical habitat of an endangered species of plant or animal? <sup>6</sup> [as applicable: 30 TAC 335.204(a)(8), (b)(10), (c)(9), (d)(9), and/or (e)(11)]	No
<b>If Yes:</b> submit in Section V information demonstrating that design, construction, and operational features will prevent adverse effects on such critical habitat.	
On the recharge zone of a sole-source aquifer? <sup>2</sup> [30 TAC 335.204(a)(3), (b)(3), (c)(3), (d)(3), and/or (e)(3)]	No
<b>If Yes:</b> then for storage and processing facilities (excluding storage surface impoundments), submit in Section V information demonstrating that secondary containment is provided to preclude migration to groundwater from spills, leaks, or discharges.	
In an area overlying a regional aquifer? [as applicable: 30 TAC 335.204(a)(4), (b)(4), (c)(4), (d)(4), and/or (e)(4)]	No
<b>If Yes:</b> submit site-specific information in Section V and/or Section VI demonstrating compliance with 30 TAC 335.205(a)(1).	
In areas where soil unit(s) are within five feet of the containment structure, or treatment zone, as applicable, that have a Unified Soil Classification of GW, GP, GM, GC, SW, SP, or SM, or a hydraulic conductivity greater than 10-5 cm/sec? [as applicable: 30 TAC 335.204(a)(5), (b)(5), (c)(5), (d)(5), and/or (e)(5)]	No
<b>If Yes:</b> provide additional information in Sections V and/or Section VI demonstrating compliance with 30 TAC 335.205(a)(1)	
In areas of direct drainage within one mile of a lake at its maximum conservation pool level, if the lake is used to supply public drinking water through a public water system? <sup>6</sup> [as applicable: 30 TAC 335.204 (a)(6), (b)(7), (c)(6), and/or (e)(8)].	No
<b>If Yes:</b> provide information in Section V demonstrating compliance with 30 TAC 335.205(a)(1).	

In areas of active geologic processes, including but not limited to erosion, submergence, subsidence, faulting, karst formation, flooding in alluvial flood wash zones, meandering river bank cuttings, or earthquakes? <sup>6</sup> [as applicable: 30 TAC 335.204(a)(7), (b)(8) ,(c)(7), (d)(7), and/or (e)(9)]	No
Within 30 feet of the upthrown side or 50 feet of the downthrown side of the actual or inferred surface expression of a fault that has reasonably been shown to have caused displacement of shallow Quaternary sediments or of man-made structures? <sup>6</sup> [as applicable: 30 TAC 335.204(a)(9), (b)(12) ,(c)(11), (d)(11), and/or (e)(13)]	No
<p><b>If Yes:</b> specify in Section V the design, construction, and operational features that will prevent adverse effects resulting from any fault movement.</p> <p>If a fault is found to be present, the width and location of the actual or inferred surface expression of the fault, including both the identified zone of deformation and the combined uncertainties in locating a fault trace, must be determined by a qualified geologist or geotechnical engineer and reported in Section VI.</p>	

**Table II.B. - Additional Requirements for Land Treatment Facilities [30 TAC 335.204(b)]:**

Is the land treatment facility located or proposed to be located:

<p>Within 1000 feet of an established residence, church, school, day care center, surface water body used for a public drinking water supply, or dedicated public park which is in use at the time the notice of intent to file a permit application is filed with the commission, or which is in use at the time the permit application is filed with the commission?</p>	<p>No</p>
<p><b>If Yes:</b> the TCEQ shall not issue a permit for a new hazardous waste land treatment unit or an areal expansion of an existing land treatment unit, pursuant to 30 TAC 335.204(b)(6) and 335.205(a).</p>	
<p>Within 1000 feet of an area subject to active coastal shoreline erosion even though the area is protected by a barrier island or peninsula?</p>	<p>No</p>
<p><b>If Yes:</b> submit in Section V.F design, construction, and operational features which will prevent adverse effects resulting from storm surge and erosion or scouring by water.</p>	
<p>Within 5000 feet of a coastal shoreline subject to active shoreline erosion and which is unprotected by a barrier island or peninsula.</p>	<p>No</p>
<p><b>If Yes:</b> submit Section V.F design, construction and operational features, which will prevent adverse effects resulting from storm surge and erosion or scouring by water.</p>	
<p>On a barrier island or peninsula?</p>	<p>No</p>
<p><b>If Yes:</b> the TCEQ shall not issue a permit for a new hazardous waste land treatment unit or an areal expansion of an existing land treatment unit, pursuant to 30 TAC 335.204(b)(11) and 335.205(a)(1).</p>	

**Table II.C. - Additional Requirements for Waste Piles [30 TAC 335.204(c)]**

Is the waste pile located or proposed to be located:

Within 1000 feet of an area subject to active coastal shoreline erosion even though the area is protected by a barrier island or peninsula?	No
<b>If Yes:</b> submit in Section V.E design, construction, and operational features on the facility which will prevent adverse effects resulting from storm surge and erosion or scouring by water.	
Within 5000 feet of a coastal shoreline subject to active shoreline erosion and which is unprotected by a barrier island or peninsula.	No
<b>If Yes:</b> submit Section V.E design, construction, and operational features which will prevent adverse effects resulting from storm surge and erosion or scouring by water.	
On a barrier island or peninsula? <sup>6</sup>	No
<b>If Yes:</b> the TCEQ shall not issue a permit for a new hazardous waste pile or an areal expansion of an existing waste pile, pursuant to 30 TAC 335.204(c)(10) and 335.205(a)(1).	

**Table II.D. - Additional Requirements for Storage Surface Impoundments [30 TAC 335.204(d)]**

Is the land treatment facility located or proposed to be located:

Within 1000 feet of an area of active coastal shoreline erosion even though the area is protected by a barrier island or peninsula	No
<b>If Yes:</b> submit in Section V.D design, construction, and operational features of the facility which will prevent adverse effects resulting from storm surge and erosion or scouring by water.	
Within 5000 feet of a coastal shoreline subject to active shoreline erosion and which is unprotected by a barrier island or peninsula.	No
<b>If Yes:</b> then submit in Section V.D design, construction, and operational features which will prevent adverse effects resulting from storm surge and erosion or scouring by water.	
On a barrier island or peninsula? <sup>6</sup>	No
<b>If Yes:</b> the TCEQ shall not issue a permit for a new hazardous waste storage surface impoundment or an areal expansion of an existing storage surface impoundment, pursuant to 30 TAC 335.204(d)(10) and 335.205(a)(1).	

**Table II.E. - Additional Requirements for Landfills (and Surface Impoundments Closed as Landfills with wastes in place)**

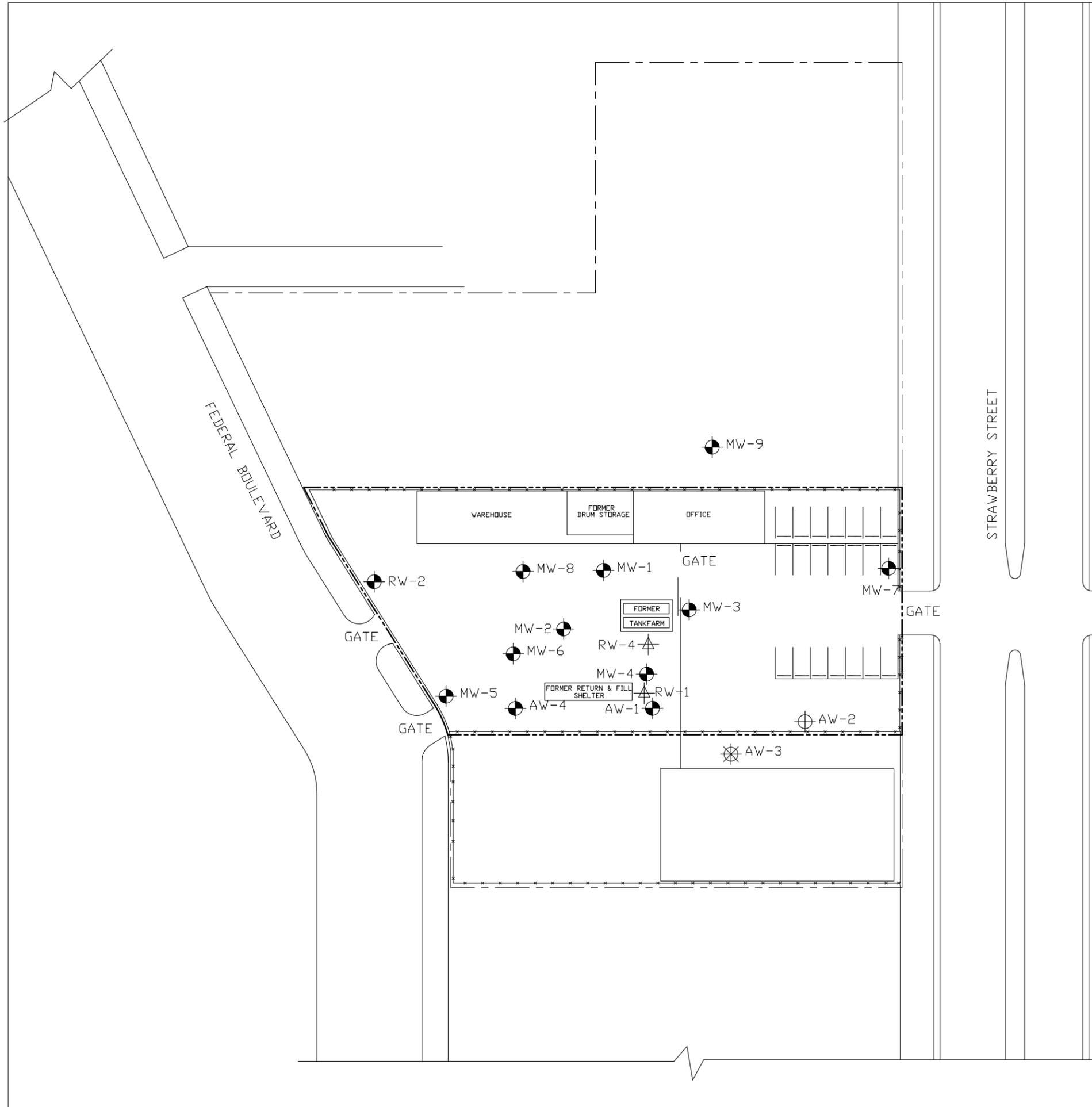
Is the landfill located or proposed to be located:

Within 1000 feet of an established residence, church, school, day care center, surface water body used for a public drinking water supply, or dedicated public park which is in use at the time the notice of intent to file a permit application is filed with the commission, or which is in use at the time the permit application is filed with the commission?	No
<b>If Yes:</b> the TCEQ shall not issue a permit for a new hazardous waste landfill or an areal expansion of an existing landfill, pursuant to 30 TAC 335.204(e)(6) and 335.205(a)(1).	
(For commercial hazardous waste landfills) in the 100-year flood plain of a perennial stream that is delineated on a flood map adopted by the Federal Emergency Management Agency after September 1, 1985, as zone A1-99, VO, or V1-30?	No
<b>If Yes:</b> the TCEQ shall not issue a permit for a new hazardous waste landfill or an areal expansion of an existing landfill, pursuant to 30 TAC 335.204(e)(7) and 335.205(a)(1).	
Within 1000 feet of an area subject to active coastal shoreline erosion even though the area is protected by a barrier island or peninsula?	No
<b>If Yes:</b> then submit in Section V.G design, construction, and operational features which will prevent adverse effects resulting from storm surge and erosion or scouring by water.	
Within 5000 feet of a coastal shoreline subject to active shoreline erosion and which is unprotected by a barriers island or peninsula.	No
<b>If Yes:</b> then submit in Section V.G design, construction, and operational features which will prevent adverse effects resulting from storm surge and erosion or scouring by water.	
On a barrier island or peninsula?	No
<b>If Yes:</b> the TCEQ shall not issue a permit for a new hazardous waste landfill or an areal expansion of an existing landfill, pursuant to 30 TAC 335.204(e)(12) and 335.205(a)(1).	

**Flooding (see Section II Instructions, Item F)**

Is the facility within a 100-year flood plain?	No
Has a flood plain map been provided?	No
Has information about flooding levels and events, and other special flooding factors, been provided? <sup>3</sup>	No
Do any flood protection devices exist at the facility (e.g., flood walls, dikes, etc.) designed to prevent washout from the 100-year flood? <sup>3</sup>	No
<b>If Yes:</b> provide in Section V an engineering analysis to indicate the various hydrodynamic and hydrostatic forces expected to result at the facility as a consequence of a 100-year flood. [40 CFR 270.14(b)(11)(iv)(A)] <sup>4</sup>	
<b>If No:</b> the applicant shall provide in Section V a plan for constructing flood protection devices and a schedule including specific time frames for completion. Provide engineering analyses to indicate the various hydrodynamic and hydrostatic forces expected to result at the facility as a consequence of a 100-year flood. [40 CFR 270.14(b)(11)(iv)(A)] <sup>5</sup>	
If applicable, and in lieu of the flood protection devices from above, was a detailed description of the procedures to be followed to remove hazardous waste to safety before the facility is flooded provided? <sup>3, 6</sup>	No
Additional Information Requirements (see Section II instructions, Item G): Submitted?	No

1. Provide the source of information for all questions in the appendix.
2. Note: Land treatment facilities, waste piles, storage surface impoundments, and landfills may not be located on the recharge zone of a sole-source aquifer.
3. Only required to be submitted if the facility is subject to inundation as a result of a 100-year flood event.
4. Include structural or other engineering studies showing the design of operational units (e.g., tanks, incinerators) and flood protection devices (e.g., flood walls, dikes) at the facility and how these will prevent washout. [40 CFR 270.14(b)(11)(iv)(B)]
5. Include structural or other engineering studies showing the design of operational units (e.g., tanks, incinerators) and flood protection devices (e.g., flood walls, dikes) at the facility and how these will prevent washout. [40 CFR 270.14(b)(11)(iv)(B)]
6. The standards contained in §335.204(a)(6) - (9), (b)(7) - (12), (c)(6) - (11), (d)(6) - (11), and (e) (8) - (13) are not applicable to facilities that have submitted a notice of intent to file a permit application pursuant to §335.391 of this title (relating to Pre-Application Review) prior to May 3, 1988, or to facilities that have filed permit applications pursuant to §335.2(a) of this title which were submitted in accordance with Chapter 305 of this title and that were declared to be administratively complete pursuant to §281.3 of this title (relating to Initial Review) prior to May 3, 1988.[ 30 TAC 335.201(b)]



LEGEND	
---x---x---	FENCE LINE
-----	FORMER S-K PROPERTY LINE
- - - - -	CIMA INTERESTS PROPERTY LINE
⊕ AW-2	MONITOR WELL (OFF SITE)
⊗ AW-3	PLUGGED MONITOR WELL
△ RW-1	RECOVERY WELL
⊕ MW-6	MONITOR WELL (ON SITE)

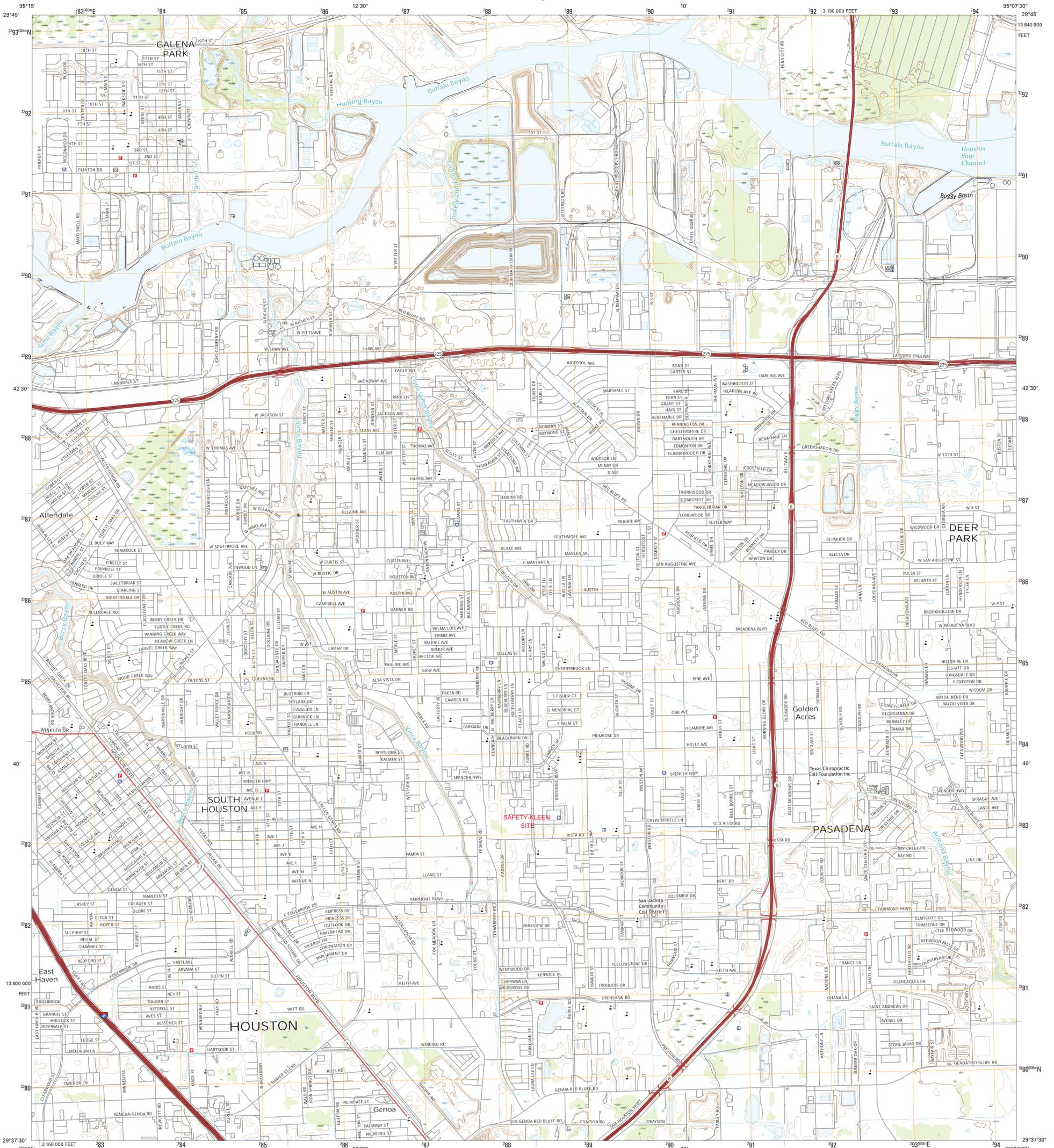
GENERAL NOTES

PROPRIETARY STATEMENT

THIS DRAWING IS THE EXCLUSIVE PROPERTY OF SAFETY-KLEEN SYSTEMS, INC. AND IS PROPRIETARY AND CONFIDENTIAL INFORMATION. THIS DRAWING AND THE INFORMATION CONTAINED THEREIN MUST NOT BE DUPLICATED, USED, DIVULGED, REPRODUCED, COPIED, DISCLOSED OR APPROPRIATED IN WHOLE OR IN PART FOR ANY PURPOSE OTHER THAN AS EXPRESSLY AUTHORIZED BY SAFETY-KLEEN SYSTEMS, INC. THIS DRAWING MUST BE RETURNED PROMPTLY UPON REQUEST.

Appendix II.2

					TITLE SITE PLAN 3333 FEDERAL RD. PASADENA TX. 77504						
					<b>SAFETY-KLEEN SYSTEMS, INC.</b> <small>42 LONGWATER DR. NORWELL, MA. 02061 PHONE 800-669-5740</small>						
A	NEW ISSUE FOR PERMIT	JEK	JZ	JZ	011226	SCALE 1"=30'	BY JEK	CHKD JZ	P.E. APPR JZ	DP. APPR JZ	DATE 1/12/26
NO.	DESCRIPTION	BY	CHK	APPR	DATE	SERVICE CENTER LOCATION PASADENA, TX.				STD-DWG-REV NO. 7PS-SP00-001	
REVISIONS											

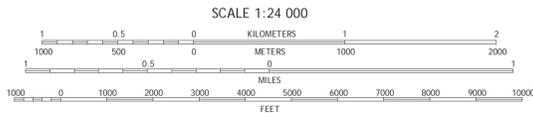


Produced by the United States Geological Survey

North American Datum of 1983 (NAD83)  
World Geodetic System of 1984 (WGS84). Projection and  
1 000-meter grid: Universal Transverse Mercator, Zone 15R  
10 000-foot ticks: Texas Coordinate System of 1963 (south  
central zone)

This map is not a legal document. Boundaries may be  
generalized for this map scale. Private lands within government  
reservations may not be shown. Obtain permission before  
entering private lands.

Imagery: NAIP, October 2014  
Roads: U.S. Census Bureau, 2014 - 2015  
Names: GNS, 2015  
Hydrography: National Hydrography Dataset, 2014  
Contours: National Elevation Dataset, 2010  
Boundaries: Multiple sources; see metadata file 1912 - 2015  
Wetlands: FWS National Wetlands Inventory 1977 - 2014



CONTOUR INTERVAL 5 FEET  
NORTH AMERICAN VERTICAL DATUM OF 1988  
This map was produced to conform with the  
National Geospatial Program US Topo Product Standard, 2011.  
A metadata file associated with this product is draft version 0.6.19



QUADRANGLE LOCATION

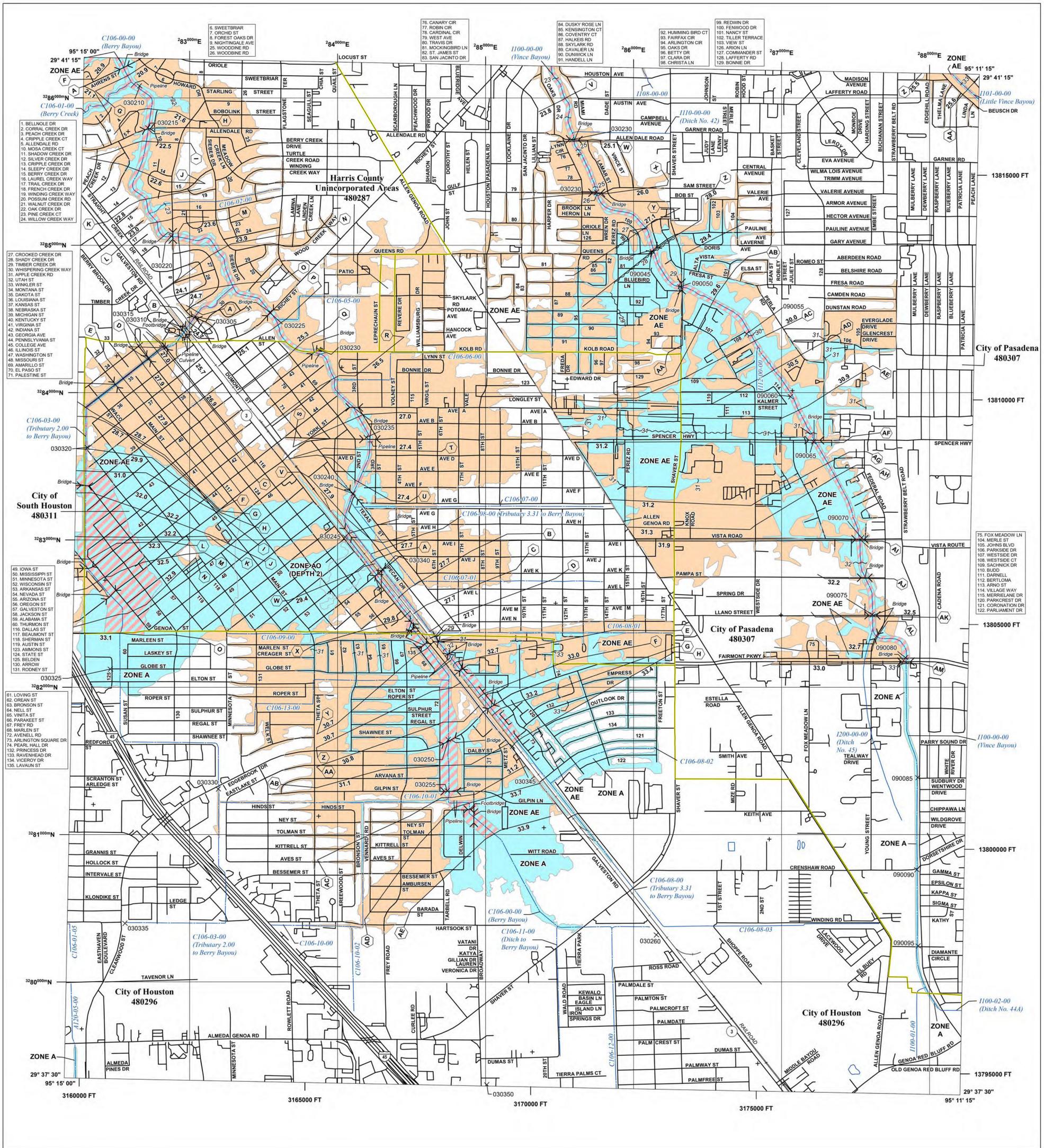
1	2	3	1 Settlegast
2	3	4	2 Jacinto City
3	4	5	3 Highlands
4	5	6	4 Park Place
5	6	7	5 La Porte
6	7	8	6 Pearland
7	8	9	7 Friendswood
8	9	10	8 League City

**ROAD CLASSIFICATION**

Expressway	Local Connector
Secondary Hwy	Local Road
Ramp	4WD
Interstate Route	US Route
	State Route

**PASADENA, TX**  
2016





**FLOOD HAZARD INFORMATION**

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT  
**THE INFORMATION DEPICTED ON THIS MAP AND SUPPORTING DOCUMENTATION ARE ALSO AVAILABLE IN DIGITAL FORMAT AT [HTTPS://MSC.FEMA.GOV](https://MSC.FEMA.GOV)**

- Without Base Flood Elevation (BFE)  
Zone A, V, A99
- With BFE or Depth Zone AE, AO, AH, VE, AR
- Regulatory Floodway
- 0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X
- Future Conditions 1% Annual Chance Flood Hazard Zone X
- Area with Reduced Flood Risk due to Levee See Notes. Zone X
- Area with Flood Risk due to Levee Zone D
- NO SCREEN Area of Minimal Flood Hazard Zone X
- Area of Undetermined Flood Hazard Zone D
- Channel, Culvert, or Storm Sewer
- Levee, Dike, or Floodwall
- Cross Sections with 1% Annual Chance Water Surface Elevation
- Coastal Transect
- Coastal Transect Baseline
- Profile Baseline
- Hydrographic Feature
- Base Flood Elevation Line (BFE)
- Limit of Study
- Jurisdiction Boundary

**NOTES TO USERS**

For information and questions about this Flood Insurance Rate Map (FIRM), available products associated with this FIRM, including historic versions, the current map date for each FIRM panel, how to order products, or the National Flood Insurance Program (NFIP) in general, please call the FEMA Map Information eXchange at 1-877-FEMA-MAP (1-877-336-2627) or visit the FEMA Flood Map Service Center website at <https://msc.fema.gov>. Available products may include previously issued Letters of Map Change, a Flood Insurance Study Report, and/or digital versions of the map. Many of these products can be ordered or obtained directly from the website.

Communities annexing land on adjacent FIRM panels must obtain a current copy of the adjacent panel as well as the current FIRM index. These may be ordered directly from the Map Service Center at the number listed above.

For community and countywide map dates refer to the Flood Insurance Study report for this jurisdiction.

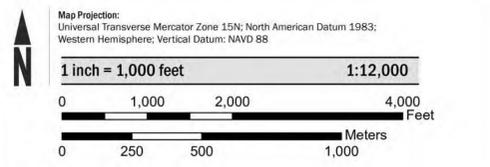
To determine if flood insurance is available in the community, contact your insurance agent or call the National Flood Insurance Program at 1-800-638-6620.

Base map information shown on this FIRM was provided in digital format by the Houston-Galveston Area Council (H-GAC) and was revised and enhanced by Harris County (2015). The Texas Natural Resources Information System (TNRIS) provided the Texas Department of Transportation (TXDOT) community boundaries and transportation layers dated 2015.

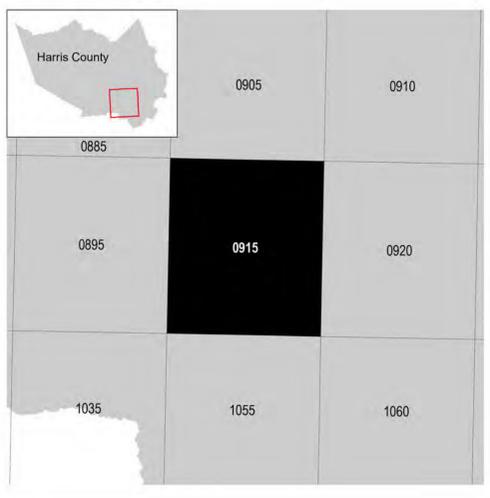
Vertical Datum Adjustment due to subsidence is the 2001 adjustment.

Benchmarks shown on this map were provided by either Harris County or the National Geodetic Survey. To obtain elevation, description, and location information for benchmarks provided by Harris County, please contact the Permits Office of the Engineering Department at 713-274-3900 or visit their website at <https://www.eng.hctx.net/permits>. For information regarding the benchmarks provided by National Geodetic Survey, please contact the Information Services Branch of the National Geodetic Survey at 301-713-3242 or visit the website at <https://www.ngs.noaa.gov>.

**SCALE**



**PANEL LOCATOR**



**National Flood Insurance Program**

**NATIONAL FLOOD INSURANCE PROGRAM**  
**FLOOD INSURANCE RATE MAP**

**HARRIS COUNTY, TEXAS**  
 and Incorporated Areas

PANEL 915 OF 1150

Panel Contains:

COMMUNITY	NUMBER	PANEL	SUFFIX
HARRIS COUNTY	480287	0915	N
HOUSTON, CITY OF	480296	0915	N
PASADENA, CITY OF	480307	0915	N
SOUTH HOUSTON, CITY OF	480311	0915	N

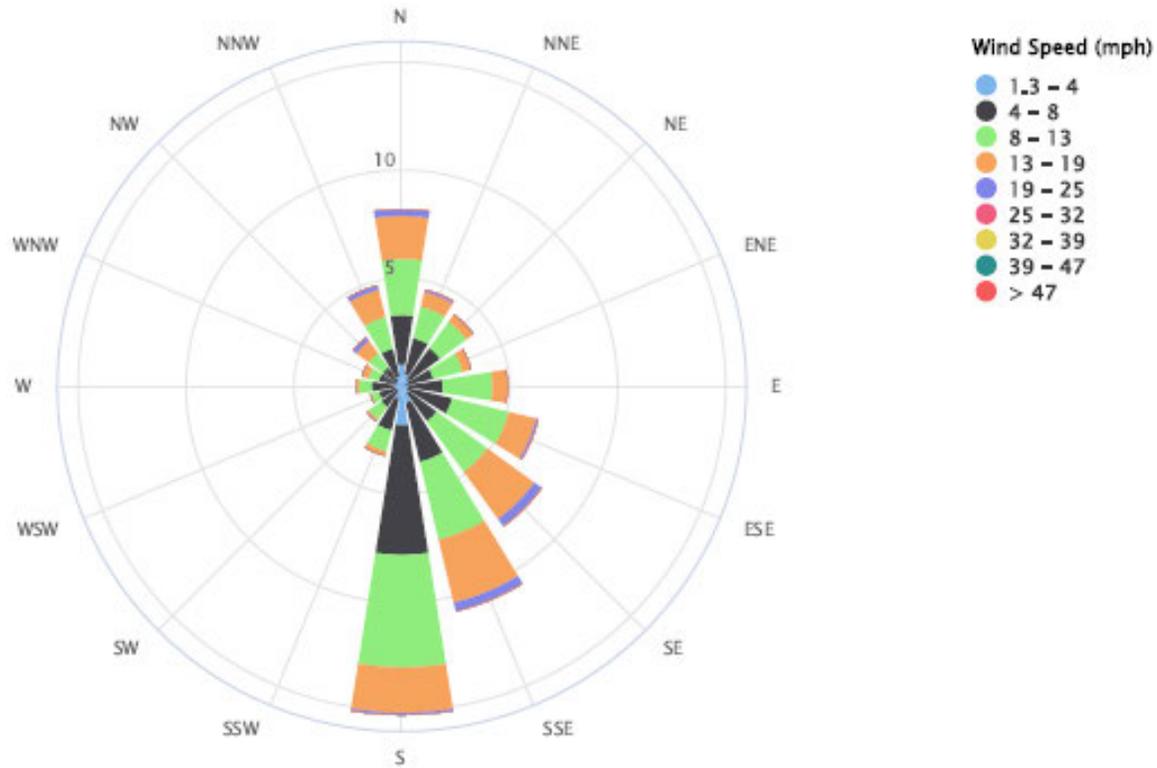
Appendix I1.4

FEMA

### HOUSTON INTERCONTINENTAL AP (TX) Wind Rose



1/1/2000 - 1/11/2026  
Sub-Interval: Jan 1 - Dec 31, 00:00 - 23:59



## Appendix III

### Facility Management

List of Appendices	
Appendix III.A	Applicant Experience
Appendix III.B	Personnel Training Plan
Appendix III.C	Security
Appendix III.D	Inspection Schedule
Appendix III.E	Contingency Plan

**Appendix III.A**  
**Applicant Experience**

**Safety-Kleen Systems, Inc.**  
**Texas Facilities**

<b>BRANCH</b>	<b>EPA ID # I&amp;HW § 335</b>	<b>PERMIT # I&amp;HW § 335</b>	<b>SWR # I&amp;HW § 335</b>	<b>ADDRESS/PHONE</b>
ABILENE, TX	TXD062287883	HW-50237	64042	4234 Oil Belt Lane Abilene, TX 79605 (432) 296-4683
ALVARADO, TX	TXR000069484	N/A	88390	4315 S. Burleson Blvd. Alvarado, TX 76009 (469) 853-2112
AMARILLO, TX	TXR000031799	N/A	86125	1750 West Loop 335 South Amarillo, TX 79118 (806) 654-3003
CORPUS CHRISTI, TX	TXD000747402	HW-50233	68053	3820 Bratton Road Corpus Christi, TX 78413 (361) 854-9471
DENTON, TX RECYCLE CENTER	TXD077603371	HW-50163	65124	1722 Cooper Creek Rd Denton, TX 76208 (940) 483-5200
EL PASO, TX	TXR000077693	N/A	88130	4050 Flagger Rd El Paso, TX 79938 (915) 849-5051
FORT WORTH, TX OIL DEPOT	TXR000001933	N/A	83150	10272 Hicks Field Rd Ft. Worth, TX 76179 (817) 847-5828
FORT WORTH, TX	TXD981053416	HW-50228	55195	6529 Midway Rd Haltom City, TX 76117 (817) 838-6966
IRVING, TX	TXD981052061	HW-50218	55194	2130 E. Grauwylar Rd Irving, TX 75061 (972) 438-4080
LONGVIEW, TX	TXD000747378	HW-50223	67028	202 Michael Street Longview, TX 75603 (903) 757-9187
McALLEN, TX	TXD083145656	HW-50234	68062	1311 E Tamarack Ave McAllen, TX 78501 (956) 682-1951
MIDLAND, TX	TXD981056690	HW-50215	72078	10607 West County Road 127 Midland, TX 79706 (432) 563-2305
MISSOURI CITY, TX	TXD010803203	HW-50236	71144	1580 Industrial Dr Missouri Drive, TX 77489 (281) 208-6500

<b>BRANCH</b>	<b>EPA ID # I&amp;HW § 335</b>	<b>PERMIT # I&amp;HW § 335</b>	<b>SWR # I&amp;HW § 335</b>	<b>ADDRESS/PHONE</b>
ODESSA, TX	TXR000084907	N/A	91872	2710 Diego Road Odessa, TX 79766 (469) 853-2112
ORANGE, TX	TXD061290276	N/A	70026	3454 Womack Rd Orange, TX 77632 (409) 886-8365
PASADENA, TX	TXD000747386	HW-50260	71143	3333 Federal Rd Pasadena, TX 77504 (281) 208-6500
ROBSTOWN, TX	TXR000086217	N/A	98412	2203 Tower Suite A Robstown, TX 78380 (361) 445-7328
SAN ANTONIO, TX	TXD000729400	HW-50246	69048	5243 Sinclair Rd San Antonio, TX 78222 (210) 648-7066
WACO, TX	TXD980876015	HW-50238	66171	22006 Woodway Dr Waco, TX 76712 (254) 772-7145

Appendix III.B  
Personnel Training Plan

Appendix III.B  
Personnel Training Plan

This Appendix is NOT APPLICABLE because the facility is currently closed and there are no employees at the site.

## Appendix III.C

### Security

## Appendix III.C

### Security

This Appendix is NOT APPLICABLE because the facility is currently closed and there are no hazardous waste management activities at the site.

## Appendix III.D Inspection Schedule

List of Appendices	
Appendix III.D.1	Table III.D – Inspection Schedule

Appendix III.D  
Inspection Schedule

This Appendix is NOT APPLICABLE because the facility is currently closed and there are no hazardous waste management activities at the site.

**Table III.D- Inspection Schedule**

Facility Unit(s) and Basic Elements	Possible Error, Malfunction, or Deterioration	Frequency of Inspection
Not Applicable		

Appendix III.E  
Contingency Plan

Appendix III.E.5  
Contingency Plan

This Appendix is NOT APPLICABLE because the facility is currently closed and there are no hazardous waste management activities at the site.

Table III.E.1, Table III.E.2 and Table III.E.3 are not included in the permit application. Since the facility is undergoing closure and there are no hazardous waste management activities at the site these tables are NOT APPLICABLE.

Appendix IV  
Wastes and Waste Analysis Plan

Appendix IV  
Wastes and Waste Analysis Plan

This Appendix is NOT APPLICABLE because the site is currently closed and there are no hazardous wastes being generated or received from offsite at the facility.

Table IV.B and Table IV.C are not included because no waste will be received or sampled at the facility and are therefore, NOT APPLICABLE.

# Appendix V

## Engineering Reports

List of Appendices	
Appendix V.A	Facility Waste Management Handling Units

Appendix V.A  
Facility Waste Management Handling Units

List of Appendices	
Appendix V.A	Facility Waste Management Handling Units

**Table V.A. - Facility Waste Management Handling Units**

TCEQ Permit Unit No. <sup>1</sup>	Unit Name	NOR No. <sup>1</sup>	Unit Description <sup>3</sup>	Capacity	Unit Status <sup>2</sup>
1	Tank (sub-surface)	1	Tank (sub-surface)	N/A	Closed
2	Container storage area	2	Container storage area	N/A	Closed
3	Tank (surface)	3	Tank (surface)	N/A	Closed
4	Tank (surface)	4	Tank (surface)	N/A	Closed
5	Misc storage containers	5	Misc storage containers	N/A	Closed
6	Sump	6	Sump	N/A	Closure Requested
7	Recovery Unit	7	Distillation/Solvent Recovery	N/A	Closure Requested

1. Permitted Unit No. and NOR No. cannot be reassigned to new units or used more than once and all units that were in the Attachment D of a previously issued permit must be listed.

2. Unit Status options: Active, Closed, Inactive (built but not managing waste), Proposed (not yet built), Never Built, Transferred, Post-Closure.

3. If a unit has been transferred, the applicant should indicate which facility/permit it has been transferred to in the Unit Description column of Table V.A.

Appendix VI  
Site Geology and Hydrogeology

List of Appendices	
Appendix VI.1	Figures
Appendix VI.A.1	Table VI.A.1 – Major Geologic Formations
Appendix VI.A.4	Table VI.A.4 – Waste Management Area Subsurface Conditions

## Appendix VI

### Site Geology and Hydrogeology

In the area of the facility, sediments of Pleistocene age are found in outcrop. These sediments are represented by the Beaumont Formation (Beaumont Clay) of Pleistocene age. The Geologic Atlas of Texas, Houston Sheet indicates that the facility is situated on an outcrop of the Beaumont Clay (Figure D-1). The Beaumont Clay in the vicinity of the facility is described as being composed predominantly of clay and mud of low permeability, high water-holding capacity, high compressibility, high to very high shrink-swell potential, poor drainage, level to depressed relief, low shear strength, and high plasticity (Geologic Atlas of Texas - Houston Sheet, 1982). Depositional environments represented within the sediments of the Beaumont Clay include interdistributary muds, abandoned channel-fill muds, and overbank fluvial muds.

Underlying the Beaumont Formation in age from youngest to oldest is the Montgomery Formation (Pleistocene), Bentley Formation (Pleistocene), Willis Sand (Pleistocene), and Goliad Sand (Pliocene) (Texas Department of Water Resources, Report 236, July 1979). The TDWR has not attempted delineation of the stratigraphic units of Pliocene and Pleistocene age due to correlation problems. Due to the lithologic similarity of the Pleistocene age sediments and the lack of paleontological control, separation of the Pleistocene units is exceedingly difficult. Therefore, for purposes of correlation, the Willis, Bentley, and Montgomery Formations have been grouped together to comprise the Lissie Formation (Texas Water Development Board, Report 155, 1983). Lithologic and stratigraphic information on each formation is provided in Tables 11.2 and 11.3.

Figure D-2 depicts the vertical distribution of lithologic units and aquifers in the Texas Coastal Plain region. Figure D-3 provides a stratigraphic/hydrogeologic section for the Harris County region that delineates the strata which comprise the regional aquifers and confining systems. Inspection of Figure D-2 reveals that the Pleistocene stratigraphic units comprise the Chicot Aquifer, and the Goliad Sand (Pliocene) and portions of the Fleming Formation (Miocene) comprise the Evangeline Aquifer. In much of the coastal area, the Chicot Aquifer consists of discontinuous layers of sand and clay of approximately equal total thickness (TDWR, Report 289, May 1985). The Evangeline Aquifer, which consists predominantly of discontinuous layers of sand and clay of approximately equal total thickness, is composed of the Goliad Sand and the uppermost part of the Fleming Formation. Because the Chicot and Evangeline Aquifers are geologically similar, the basis for separating them is primarily a difference in hydraulic conductivity, which in part causes the difference in the altitudes of the potentiometric surfaces in the two aquifers (TDWR, Report 289, May 1985). The delineation of the Chicot in the subsurface in Southeast Texas has also been based on the presence of a higher sand-clay ratio in the Chicot than in the Evangeline.

Numerous subsurface investigations have been conducted at the facility in Pasadena, Texas, in order to characterize the shallow stratigraphy and uppermost water bearing zone. A brief overview of site specific conditions is provided in this report.

Correlation of soil boring logs in the "Ponds" area (Stormwater Pond and Bauxite Pond area) indicate the presence of three water-bearing zones underlying the facility (Part B Application, February, 1986). The cross-sections on Figure D-4 indicate the general stratigraphy underlying the facility reported by Resource Engineering, Inc. (REI), in the February 1986 Part B Application as a result of a cone penetrometer survey. The strata below the site, as determined from the cone penetrometer soundings, have been grouped into seven generalized layers.

These consist of (in descending stratigraphic order), 1) a surficial layer of fill material, 2) a clay layer, 3) a clayey fine silt grading into a fine sand, 4) a second clay layer, 5) a silty clay layer, 6) a sand layer which appears to delineate an old stream channel, and 7) a basal clay layer. These layers are all part of the Beaumont Formation and appear to exhibit good continuity across the site.

The uppermost water-bearing zone is encountered at a depth of approximately 15 feet below grade and is separated from the second water bearing zone by about 10 feet of clay. Laboratory tests conducted by REI in 1986 indicate a permeability of about  $1 \times 10^{-10}$  cm/sec for the clay separating the first and second water bearing zones. The uppermost water bearing zone (zone "A" of the Part B Permit Application) has been interpreted as an overbank deposit of silty sand material. This deposit appears to be relatively continuous across the site.

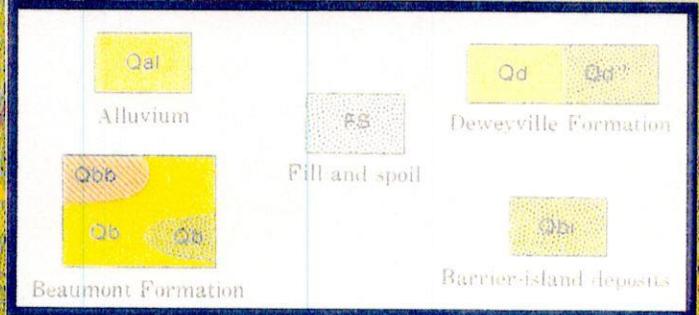
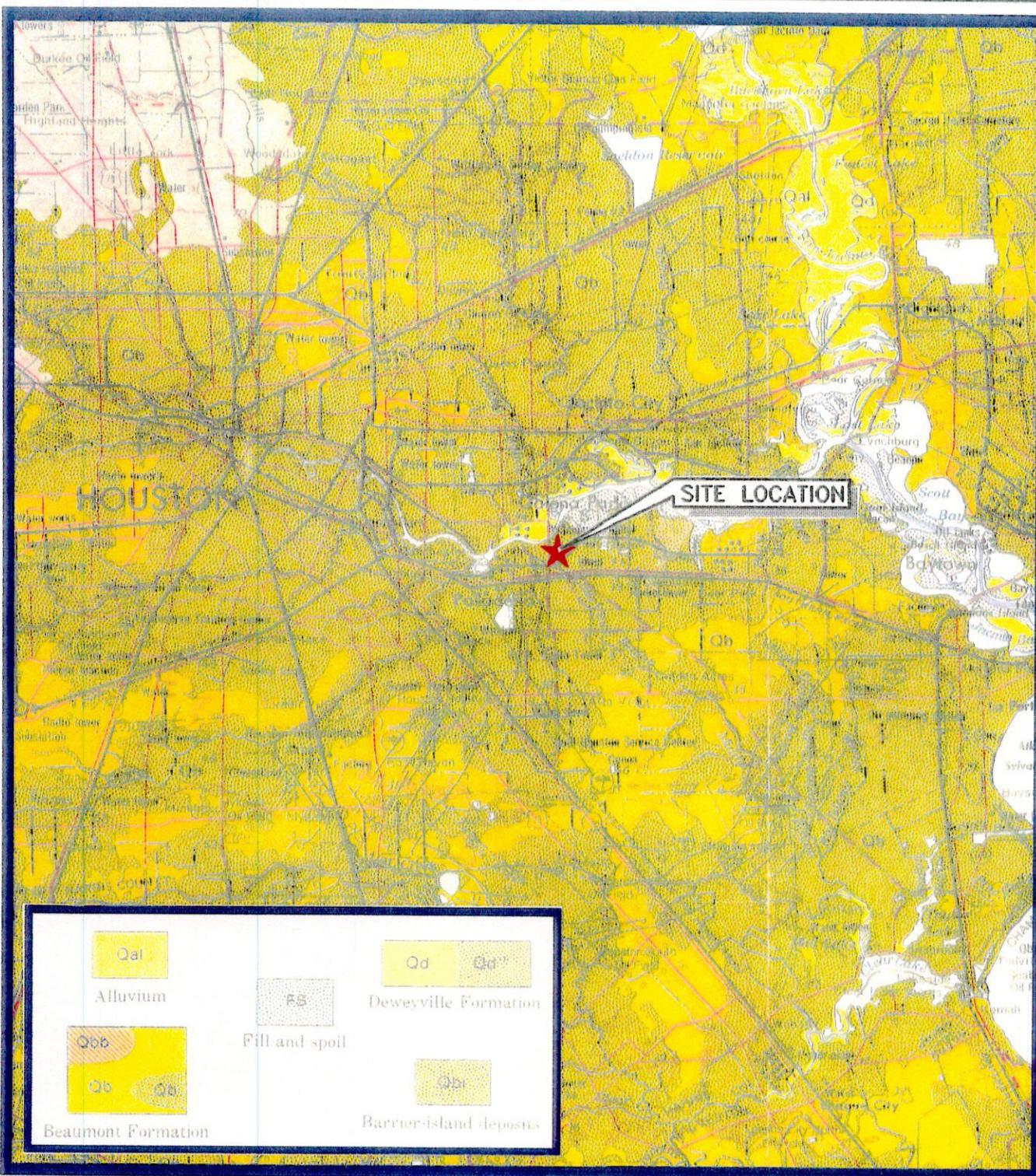
The second water-bearing zone (zone "B" of the Part B Permit Application) has been described as a gray, sandy deposit and is encountered at an elevation of approximately -4 feet msl. Data retrieved from previous investigations indicate that the second water bearing zone is a fluvial channel sand that is approximately 15 feet thick at its center. The second water bearing zone is not found throughout the site, but appears to be a local phenomenon encountered in the Ponds area. The second water bearing zone is separated from the third water bearing zone by

approximately 30 to 40 feet of clay material. Laboratory tests conducted by REI in 1986 on this clay also indicate a permeability of  $1 \times 10^{-9}$  to  $1 \times 10^{-10}$  cm/ sec.

The third water-bearing zone (zone "C" of the Part B Permit Application) has also been interpreted as an overbank deposit. This unit is approximately 4 to 5 feet in thickness and is encountered at an elevation of about -54 feet msl. The third water bearing zone appears to be relatively consistent in thickness and continuous across the Ponds area.

In 1986, REI conducted pumping tests in wells screened within each aquifer to determine the hydraulic characteristics of each of the three water bearing zones. Table VI.A.4 summarizes the relevant data for the aquifers.

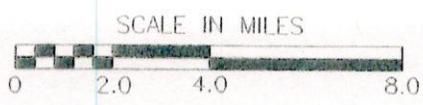
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 Attached Xref's:  
 Plot Time:  
 Plot Date:  
 Operator Name: DWH  
 Scale: 1" = 1



SOURCE: THE BUREAU OF ECONOMIC GEOLOGY, THE UNIVERSITY OF TEXAS AT AUSTIN, GEOLOGIC ATLAS OF TEXAS HOUSTON SHEET (1982)

**FIGURE D-1  
GEOLOGY OF FACILITY  
AND SURROUNDING AREA**

**CROWN CENTRAL PETROLEUM CORPORATION**  
PASADENA, TEXAS



	DWN. BY: DWH
	APPROVED BY: E.C.
	DATE: 4/28/98
	PROJ. # 50-01075.26
FILE # 10752502	

PLOT DATA  
 Drawing Name: 10752502.DWG









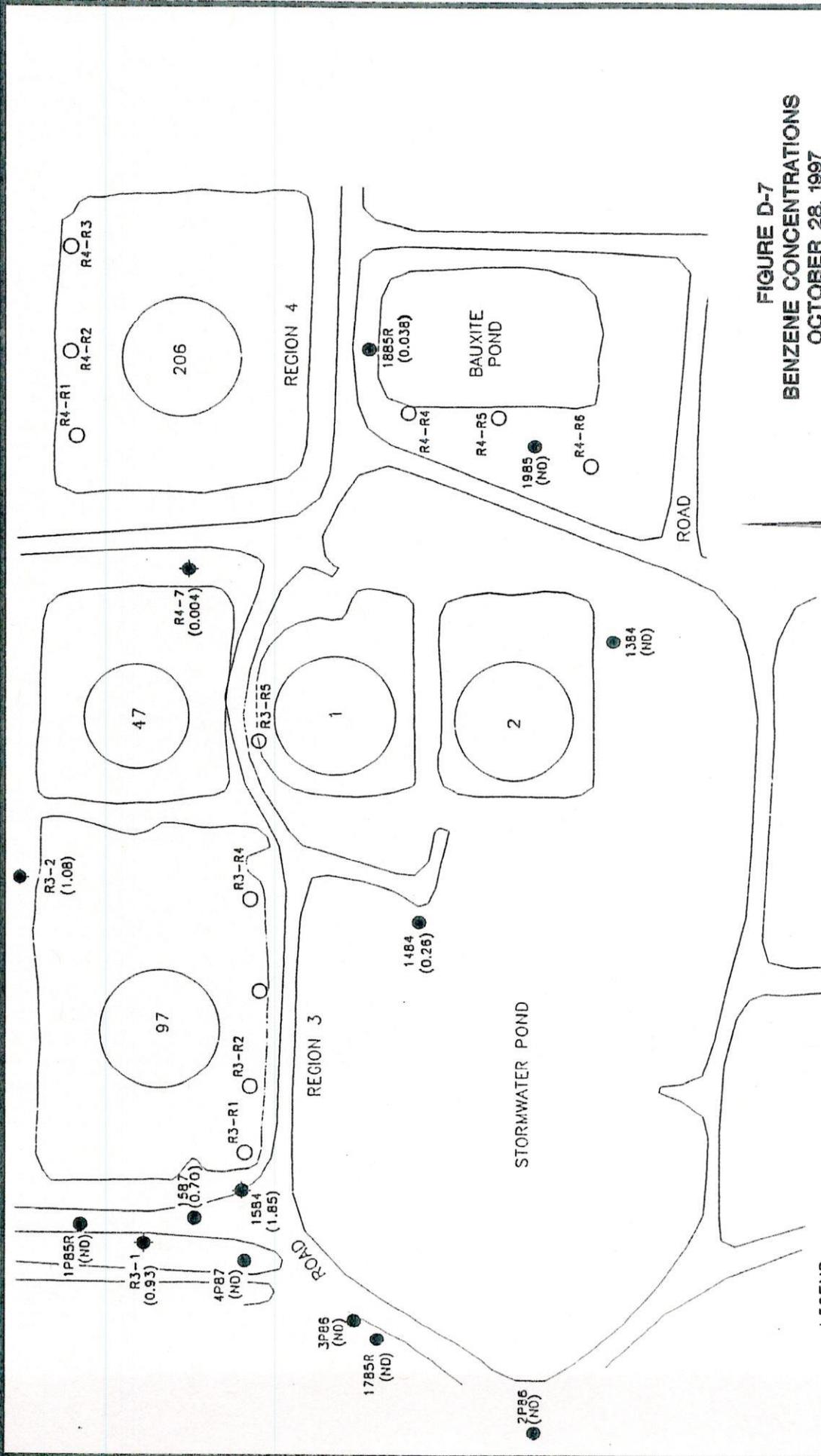


PLOT DATA  
Drawing Name: 10752608

Operator Name: DWH  
Scale: 1=1

Plot Time: J-P  
Plot Date: 4/28/98

Dwg Size: x  
Attached Xrefs: x



LEGEND

- SUPPLEMENTAL WELL
- POINT OF COMPLIANCE WELL
- RECOVERY WELL
- (ND) NOT DETECTED

FIGURE D-7  
BENZENE CONCENTRATIONS  
OCTOBER 28, 1997



DWN. BY: DWH
APPROVED BY: E.C.
DATE: 4/28/98
PROJ. # 50-01075.26
FILE # 10752608

SOURCE: ERM-SOUTHWEST, INC. (1/5/98)

PLOT DATA  
Drawing Name: 10752608

Operator Name: DWH  
Scale: 1=1

Plot Time: 3:50p  
Plot Date: 4/28/98

Dwg Size: X  
Attached Xref's: X

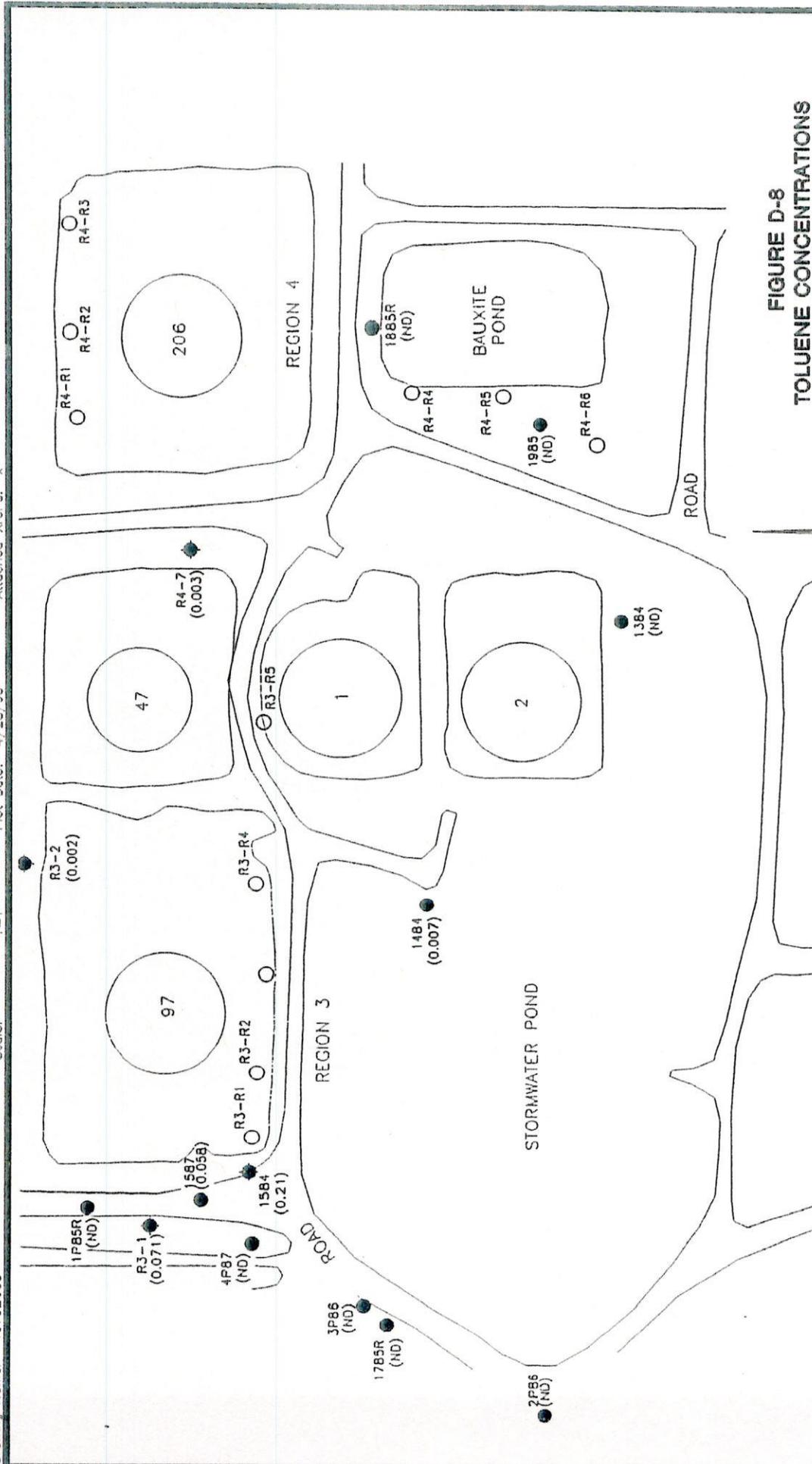
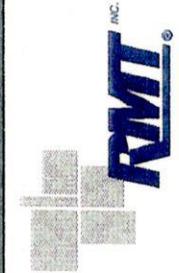


FIGURE D-8  
TOLUENE CONCENTRATIONS  
OCTOBER 28, 1997



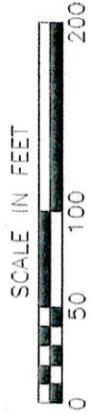
CROWN CENTRAL PETROLEUM CORPORATION  
PASADENA, TEXAS



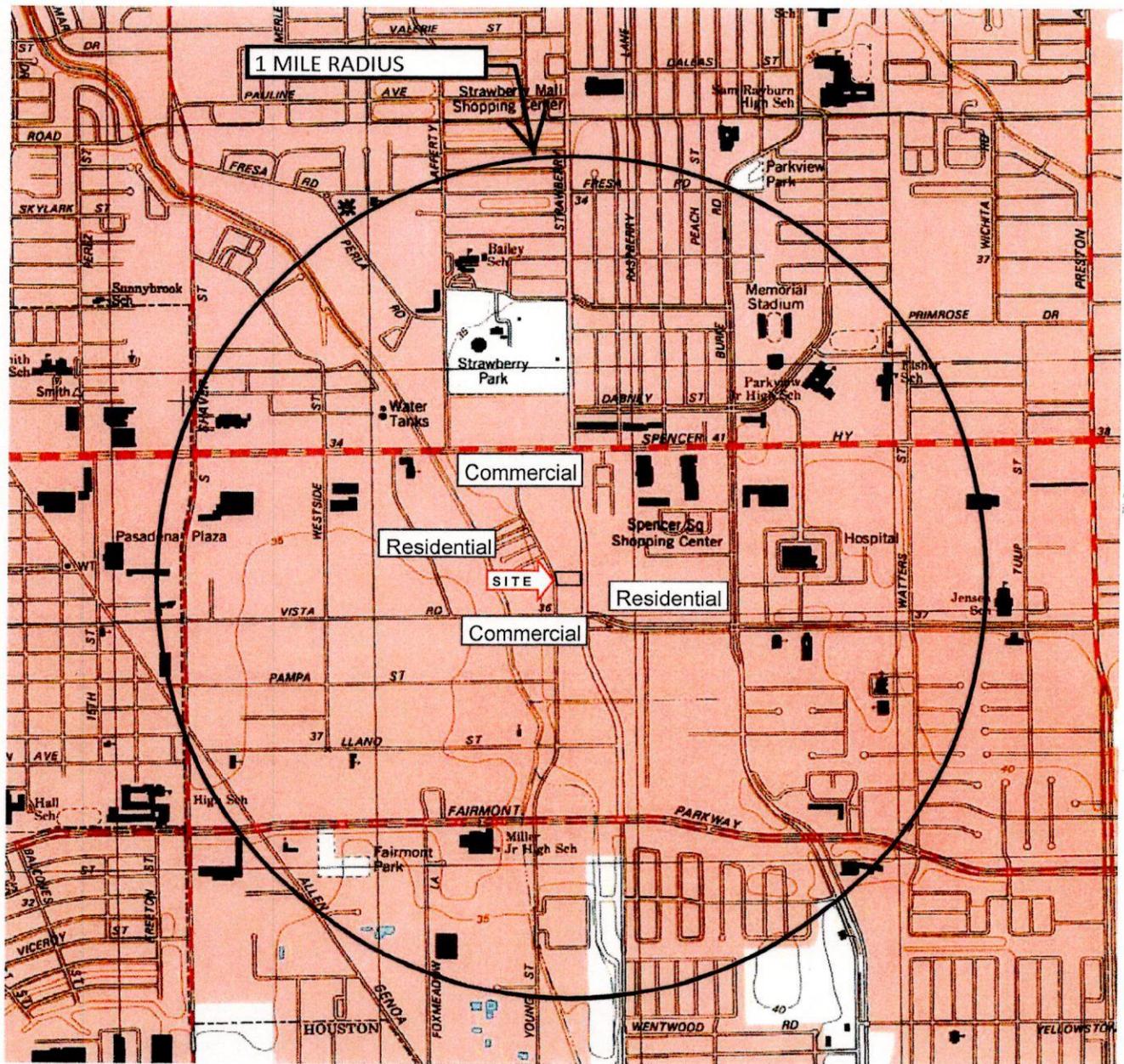
DWN. BY: DWH  
APPROVED BY: E.C.  
DATE: 4/28/98  
PROJ. # 50-01075.26  
FILE # 10752608

LEGEND

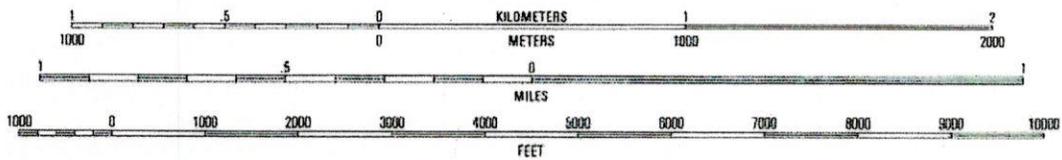
- SUPPLEMENTAL WELL
- POINT OF COMPLIANCE WELL
- RECOVERY WELL
- (ND) NOT DETECTED



SOURCE: ERM-SOUTHWEST, INC. (12/31/97)



SCALE 1:24 000



Safety-Kleen Systems  
3333 Federal Road  
Pasadena, TX 77504



ATTACHMENT C  
1 MILE RADIUS MAP  
(Item III.C.1)  
Source: USGS Topo Map  
Pasadena Quad  
1995

**Table VI.A.1. – Major Geologic Formations**

Names Of Major Geologic Formation(s) Beneath The Facility	Lithology Of The Major Geologic Formation	Formation Thickness (Feet)	Depth To Top Of Formation	
			Feet/MSL(1)	Feet/BGS(2)
1. Beaumont Formation	Dominantly clays, silts, sand and gravel. Stream channel, point bar, natural levee, backswamp, coastal marsh, mud flat, and lagoonal deposits.	100 +/-	35 (surface)	0
2. Lissie Formation	Sand, silt, clay and minor amounts of gravel. Calcareous, iron oxide and iron-manganese nodules common in weathered zone.	200 +/-	-65	100
3. Willis Formation	Gravel, sand, silt and clay	75-200 +/-	-265	300
4. Fleming Formation	Clay and Sandstone. Some quartz	1,300-1450 +/-	-465	500

(1) *MSL*: Mean Sea Level

*MLGL*: Mean Low-tide Gulf Level

(2) *BGS*: Below Grade Surface





Appendix VII  
Closure Plan

Appendix VII  
Closure Plan

This Appendix is NOT APPLICABLE because the facility is currently closed and there are no hazardous waste management activities at the site.

Appendix VIII  
Financial Assurance Information

List of Appendices	
Appendix VIII.1	Financial Disclosure Letter for Safety-Kleen Systems, Inc.
Appendix VIII.2	Hazardous Waste Facility Certificate of Liability Insurance

Appendix VIII  
Financial Assurance Information

<b>VII.A-8</b>	<b>270.14(b)(17); 264.147</b>	<b>Liability Requirements</b>
<b>VII.A-8a</b>	<b>270.14(b)(17); 264.147(a)</b>	<b>Coverage for Sudden Accidental Occurrences</b>

Coverage for sudden accidental occurrences of at least \$1 million per occurrence with annual aggregate of at least \$2 million is maintained. A copy of the Hazardous Waste Facility Certificate of Liability Insurance is included in Appendix VIII.2.

<b>VII.A-8a(1)</b>	<b>270.14(b)(17); 264.147(a)(1)</b>	<b>Endorsement of Certification</b>
--------------------	---	-------------------------------------

Safety-Kleen's original Hazardous Waste Facility Liability Certificate of Liability wording is identical to 40 CFR 264.151(j). Each insurance policy is issued by an insurer which, at a minimum, is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

<b>VII.A-8a(2)</b>	<b>270.14(b)(17); 264.147(a)(2), (f)(g); 264.151(f)(g)</b>	<b>Financial Test and Corporate Guarantee for Liability Coverage</b>
--------------------	--	--

The facility does not use a Corporate Guarantee for liability coverage. Therefore, this section does not apply.

<b>VII.A-8a(3)</b>	<b>270.14(b)(17); 264.147(a)(1)</b>	<b>Use of Multiple Financial Mechanisms</b>
--------------------	---	---

The facility does not use Multiple Financial Mechanism for liability coverage. Therefore, this section does not apply.

**VII.A-8b**      **270.14(b)(17);**      **Coverage for Nonsudden Accidental Occurrences**  
**264.147(b)**

Safety-Kleen's Pasadena facility does not meet the definition of a high risk storage facility, surface impoundment, land disposal, or land treatment facility. Therefore, the insurance requirements under this section do not apply.



January 7, 2026

Manager, Industrial and Hazardous Waste Permits Section  
Texas Commission on Environmental Quality  
Building F, MC 130  
12100 Park 35 Circle  
Austin, Texas 78753

RE: Financial Disclosure Letter for Safety-Kleen Systems, Inc.  
Permit Renewal  
Hazardous Waste Permit No. 50240  
Industrial Solid Waste Registration No. 71143  
EPA ID No. TXD000747386  
RN100591197; CN600128128

To Whom It May Concern:

This letter is furnished to you in response to financial disclosure requirements as applicable under Texas Health and Safety Code Section 361.085 and Title 30, Texas Administrative Code (30 TAC), Section 305.50 to provide assurance that Safety-Kleen Systems, Inc. has sufficient financial resources.

In keeping with the above law and rule requirements I hereby certify that Safety-Kleen Systems, Inc. is adequately capitalized and has sufficient financial resources to operate, close, provide post-closure care for and perform corrective action for the above-reference facility in a safe manner, and in compliance with the permit and all applicable rules.

Safety-Kleen System, Inc. currently provides, a financial assurance mechanism as set out in 30 TAC, Chapter 37, Subchapter C to meet Safety-Kleen System, Inc. financial assurance obligations through an insurance policy.

I am authorized to make these statements on behalf of Safety-Kleen Systems, Inc. I understand that the TCEQ may request additional information as part of their review.

Sincerely,

A handwritten signature in blue ink, appearing to read "Matthew Sauvageau", is written over a horizontal line.

Matthew Sauvageau  
SVP Branch and Central Environmental Compliance  
Safety-Kleen Systems, Inc.



Clean Harbors Environmental Services, Inc.  
610 131<sup>st</sup> Place  
Hammond, IN 46327  
219-746-5050  
800.282.0058  
www.cleanharbors.com

**VIA FEDERAL EXPRESS TRK #885581076448**

October 29, 2025

Mr. Mark Stuebner  
Revenue Section, Financial Assurance  
Texas Commission on Environmental Quality  
Building A/3, MC-184  
12100 Park 35 Circle  
Austin, TX 78753

**RE: Hazardous Waste Facility Liability Insurance**  
Safety-Kleen Systems, Inc – Multiple locations  
Altair Disposal Services, LLC – EPA ID # TXD980624274  
Disposal Properties, LLC – EPA ID # TXD052649027  
Clean Harbors Deer Park, LLC – EPA ID # TXD055141378  
Clean Harbors San Leon, Inc. – EPA ID # TXD981053770  
Clean Harbors LaPorte, LLC – EPA ID # TXD982290140  
HPC Industrial Services, Inc. – EPA ID # TXR000025791

Dear Mr. Stuebner:

Please find enclosed an Endorsement (61) for Liability State of Texas and a State of Texas Underground Storage Tank Endorsement (60) for the facilities referenced above. The endorsements are issued by Great American Insurance Company. The policy number is PRE E603235 05 and the policy period is November 1, 2025 – November 1, 2026.

A signed duplicate original of the policy will be made available in 30-60 days and submitted upon request from the TCEQ.

If you have any questions or concerns regarding this submittal, please feel free to contact me at [REDACTED] or at 219-746-5050.

Sincerely,

Pamela K. Harvey, CHMM  
Sr. Manager Environmental Compliance

Enclosures



Administrative Offices  
 301 E. 4th Street  
 Cincinnati, OH 45202  
 Tel: 1-513-389-5000

Endorsement No. 61

This endorsement, effective 12:01 a.m., 11/1/2025, forms a part of Policy No: PRE E603235 05 issued to Clean Harbors, Inc. By Great American Insurance Company

**THIS ENDORSEMENT CHANGES THE POLICY. PLEASE READ IT CAREFULLY.**

**ENDORSEMENT FOR LIABILITY STATE OF TEXAS**

This endorsement modifies insurance provided under the following:

PREMISES ENVIRONMENTAL LIABILITY INSURANCE POLICY

The INSURED and the Company agree to the following Policy change(s):

1. This endorsement certifies that the policy to which the endorsement is attached provides liability insurance covering bodily injury and property damage in connection with the Insured's obligation to demonstrate financial responsibility under 30 TAC §37.404 (relating to Liability Requirements for Sudden and Nonsudden Accidental Occurrences). The coverage applies at:

Permit Number	Name	Address (Physical and Mailing)
Sudden Accidental Occurrences \$1,000,000 each occurrence and \$2,000,000 annual aggregate		
SWR# 64042	Safety-Kleen Systems, Inc.	4234 Oil Belt Lane Abilene, TX 79605
SWR# 86125	Safety-Kleen Systems, Inc.	1750 W Loop 335 S Amarillo, TX 79110
SWR # 68053	Safety-Kleen Systems, Inc.	3820 & 3822 Bratton Road Corpus Christi, TX 78413
SWR# 65124	Safety-Kleen Systems, Inc.	1722 Cooper Creek Road Denton, TX 87208
SWR# 88130	Safety-Kleen Systems, Inc.	4050 Flager Road El Paso, TX 79938
SWR# 83150	Safety-Kleen Systems, Inc.	10272 Hicks Field Road Fort Worth, TX 76179
SWR# 55195	Safety-Kleen Systems, Inc.	6529 Midway Road Fort Worth, TX 76117
SWR# 55194	Safety-Kleen Systems, Inc.	2130 E. Grauwlyer Road "A" Irving, TX 75603
SWR# 67028	Safety-Kleen Systems, Inc.	202 Michael Road Longview, TX 75061
SWR# 68062	Safety-Kleen Systems, Inc.	1311 East Tamarack McAllen, TX 78501
SWR# 72078	Safety-Kleen Systems, Inc.	10607 West County Road 127 Midland, TX 79711
SWR# 71144	Safety-Kleen Systems, Inc.	1580 Industrial Road Missouri City, TX 77459
SWR# 70026	Safety-Kleen Systems, Inc.	3454 Womack Road Orange, TX 77632



Administrative Offices  
301 E. 4th Street  
Cincinnati, OH 45202  
Tel: 1-513-389-5000

SWR# 71143	Safety-Kleen Systems, Inc.	3333 Federal Road Pasadena, TX 77504
SWR #31905	Disposal Properties, LLC	4303 Profit Drive San Antonio, TX 78219
SWR #69048	Safety-Kleen Systems, Inc.	5423 Sinclair Road San Antonio, TX 78222
SWR # 66171	Safety-Kleen Systems, Inc.	22006 Woodway Drive Waco, TX 76712
Sudden and Nonsudden Accidental Occurrences \$4,000,000 each occurrence and \$8,000,000 annual aggregate		
SWR# 50225	Clean Harbors LaPorte LLC	500 Independent Parkway South LaPorte, TX 77571
SWR# 50089	Clean Harbors Deer Park, LLC	2027 Independence Parkway South, Deer Park, TX 77536
SWR# 34814	Clean Harbors San Leon, Inc.	2700 Avenue South San Leon, TX 77539
MSW #203A	Altair Disposal Services, LLC	2 Miles North of Altair, West Side of Hwy 71, Altair, TX 77412

The limits of liability are stated above, exclusive of legal defense costs.

2. The insurance afforded with respect to such occurrences is subject to all of the terms and conditions of the policy; provided, however, that any provisions of the policy inconsistent with subsections (a) through (e) of this Paragraph are hereby amended to conform with subsections (a) through (e):
  - (a) Bankruptcy or insolvency of the insured shall not relieve the insurer of its obligations under the policy to which this endorsement is attached.
  - (b) The Insurer is liable for the payment of amounts within any deductible, applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 30 TAC §37.541 (relating to Financial Test for Liability).
  - (c) Whenever requested by the TCEQ executive director, the Insurer agrees to furnish to the executive director a signed duplicate original of the policy and all endorsements.
  - (d) Cancellation of this endorsement, whether by the Insurer, the Insured, or a parent corporation providing insurance coverage for its subsidiary, or by a firm having an insurable interest in and obtaining liability insurance on behalf of the owner or operator of the facility, will be effective only upon written notice and only after the expiration of 60 days after a copy of such written notice is received by the TCEQ executive director.
  - (e) Any other termination of this endorsement will be effective only upon written notice and only after the expiration of 30 days after a copy of such written notice is received by the TCEQ executive director.

Attached to and forming part of POLICY No. PRE E603235 04 issued by Great American Insurance Company herein called the Insurer, of 301 E 4th St, Cincinnati, OH 45202, to Clean Harbors, Inc. and entities named above this 1st day of November, 2025. The effective date of said policy is this 1st day of November, 2025.



Administrative Offices  
301 E. 4th Street  
Cincinnati, OH 45202  
Tel: 1-513-389-5000

I hereby certify that the wording of this endorsement is identical to the wording specified in 30 TAC §37.641. as such regulations were constituted on the date first above written and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

A handwritten signature in blue ink, appearing to read "Heather A. Boyd".

(Signature of Authorized Representative of Insurer)

(Date): 11/1/2025

(Type Name): Heather A. Boyd

(Title) Divisional/Subsidiary Vice President, Environmental Division, Authorized Representative of Great American Insurance Company

(Address of Representative): 31 St. James Ave., Suite 830, Boston, MA 02116

All other terms and conditions remain the same.



Administrative Offices  
301 E. 4th Street  
Cincinnati, OH 45202  
Tel: 1-513-389-5000

Endorsement No. 60

This endorsement, effective 12:01 a.m., 11/1/2025, forms a part of Policy No: PRE E603235 05 issued to Clean Harbors, Inc. By Great American Insurance Company

**THIS ENDORSEMENT CHANGES THE POLICY. PLEASE READ IT CAREFULLY.**

**STATE OF TEXAS  
UNDERGROUND STORAGE TANK ENDORSEMENT**

This endorsement modifies insurance provided under the following:

PREMISES ENVIRONMENTAL LIABILITY INSURANCE POLICY

The INSURED and the Company agree to the following Policy change(s):

Name: HPC Industrial Services, LLC  
Address: 1980 Highway 146 N, LaPorte, TX 77571  
Policy Number: PRE E603235 05  
Period of Coverage: November 1, 2025 TO November 1, 2026  
Name of Insurer : Great American Insurance Company  
Address of Insurer: 301 E. 4<sup>th</sup> Street  
Cincinnati, OH 45202  
Name of Insured: Clean Harbors, Inc.  
Address of Insured: 42 Longwater Drive  
Norwell, MA 02016

**ENDORSEMENT:**

1. This endorsement certifies that the policy to which the endorsement is attached provides liability insurance covering the following underground storage tanks:

ADDRESS	NO OF TANKS	TCEQ NUMBER
HPC Industrial Services 1980 Highway 146 N, LaPorte, TX 77571	2	Facility No 42916

for taking corrective action and compensating third parties for bodily injury and property damage caused by accidental releases; in accordance with and subject to the limits of liability, exclusions, conditions, and other terms of the policy arising from operating the underground storage tank(s) identified above.



Administrative Offices  
301 E. 4th Street  
Cincinnati, OH 45202  
Tel: 1-513-389-5000

The limits of liability are \$1,000,000 each occurrence and \$1,000,000 annual aggregate limits of the Insurer's liability, exclusive of legal defense costs which are subject to a separate limit under the policy. This coverage is provided under PRE E603235 05. The effective date of said policy is November 1, 2025.

2. The insurance afforded with respect to such occurrences is subject to all of the terms and conditions of the policy, provided, however, that any provisions inconsistent with subsections (a) to (e) inclusive, of this Paragraph 2 are hereby amended to conform with subsections (a) to (e), inclusive:
  - a. Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy to which this endorsement is attached.
  - b. The Insurer is liable for the payment of amounts within any deductible applicable to the policy to the provider of corrective action or a damaged third-party, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated under another mechanism or combination of mechanisms as specified in Title 30, TAC §37.0825 of this title (relating to Insurance and Risk Retention Group Coverage), §37.840 of this title (relating to Surety Bond), §37.845 of this title (relating to Letter of Credit) and §37.845 of this title (relating to Trust Fund).
  - c. Whenever requested by the Executive Director of the TCEQ, the Insurer agrees to furnish to the State Director, a signed duplicate original of the policy and all endorsements
  - d. Cancellation or any other termination of the insurance by the Insurer, except for nonpayment of premium or misrepresentation by the insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the insured. Cancellation for nonpayment of premium or misrepresentation by the insured will be effective only upon written notice and only after expiration of a minimum of ten (10) days after a copy of such written notice is received by the insured.
  - e. The insurance covers claims otherwise covered by the policy that are reported to the Insurer within six months of the effective date of cancellation or nonrenewal of the policy except where the new or renewal policy has the same retroactive date or a retroactive date earlier than that of the prior policy, and which arise out of any covered occurrence that commenced after the policy retroactive date if applicable and prior to such policy renewal or termination date. Claims reported during such extended reporting period are subject to the terms, conditions, limits, including limits of liability, and exclusions of the policy.

I hereby certify that the wording of this endorsement is identical to the wording in 30 TAC §37.835(b)(1) of this title (relating to Insurance and Risk Retention Group Coverage) and that the Insurer is licensed to transact the business of Insurance in Texas.

  
(Signature of Authorized Representative of Insurer)

Date: 11/1/2025

Name of Person Signing:	Heather A. Boyd
Title of Person Signing:	Divisional Vice President, Environmental Division
Authorized Representative of:	Great American Insurance Company
Address of Representative:	31 St James, Suite 830, Boston, MA 02116

All other terms and conditions remain the same.

## Appendix IX

### Releases from Solid Waste Units and Corrective Action

List of Appendices	
Appendix IX.1	Preliminary Review Facility Checklist
Appendix IX.2	Preliminary Review Unit Checklist

**Preliminary Review Facility Checklist**

Facility:	Safety-Kleen Systems, Inc.	City:	Pasadena
ISW Reg. No:	71143	Date:	February 2, 2026
Permit No.	50260	Reviewer:	Ricardo Saucedo
EPA ID No.	TXD000747386		

A. Waste Management Units:

RCRA Regulated Units:

NOR. No.	Description	Status
1	Tank (sub-surface)	Closed 9-13-99
2	Container Storage Area	Closed 9-13-99
3	Tank (surface)	Closed 9-13-99
4	Tank (surface)	Closed 9-13-99
5	Miscellaneous Storage Containers	Closed 11-12-09

Solid Waste Management Units:

NOR. No.	Description	Status
6	Recovery System Sump	Closure Pending - Requested 8-6-15

NOR. No.	Description	Status
7	Recovery System Separator	Closure Pending - Requested 8-6-15

B. Reviewed Documents

RCRA:

Part A

Part B

Permit

CERCLA:

Inspection Reports: TCEQ Inspection reports

Enforcement Actions None

Exposure Information None

Other Information: Semi-Annual Groundwater Monitoring Reports Submitted to TCEQ.

C. Summary:

All RCRA regulated WMUs are closed and SWMUs are pending closure.

D. Recommended Action::

Continued compliance monitoring activities as prescribed in the Compliance Plan.

**Preliminary Review Unit Checklist**

Facility:	Safety-Kleen Systems, Inc.	City:	Pasadena
ISW Reg. No:	71143	Date:	February 2, 2026
Permit No.	50260	Reviewer:	Ricardo
EPA ID No.	TXD000747386		

Waste Management Unit(s):

A. NOR No.:	1, 3, 4
B. Description:	Tank (sub-surface), Tank (surface)
C. Dates of Operation:	Closed 9-13-99
Wastes Managed:	Previously managed 0501203H, 0527695H
Evidence of Release:	None
Pollutant Dispersal Pathways:	None
Summary:	Closed Units
Recommended Action:	None
A. NOR No.:	2
B. Description:	Container Storage Area
C. Dates of Operation:	Closed 9-13-99
Wastes Managed:	N/A
Evidence of Release:	None
Pollutant Dispersal Pathways:	None
Summary:	Closed Unit
Recommended Action:	None
A. NOR No.:	5
B. Description:	Miscellaneous storage containers
C. Dates of Operation:	Closed 11-12-2009

Wastes Managed:	03009992, 03011011
Evidence of Release:	None
Pollutant Dispersal Pathways:	None
Summary:	Closed Unit
Recommended Action:	None
A. NOR No.:	6
B. Description:	Sump
C. Dates of Operation:	Closure Requested 8-6-2015
Wastes Managed:	03011011, 20041141
Evidence of Release:	None
Pollutant Dispersal Pathways:	None
Summary:	Closure Requested 8-6-2015
Recommended Action:	None
A. NOR No.:	7
B. Description:	Distillation/Solvent recovery unit
C. Dates of Operation:	Closure Requested 8-6-2015
Wastes Managed:	03011011, 20041141
Evidence of Release:	None
Pollutant Dispersal Pathways:	None
Summary:	Closure Requested 8-6-2015
Recommended Action:	None

Appendix X  
Air Emission Standards

Appendix X  
Air Emission Standards

This Appendix is NOT APPLICABLE because the site is currently closed and there are no hazardous wastes being managed at the facility.

Air Emission Standard Certifications and Tables X.B and X.C are not included in the permit application. Since the facility is undergoing closure and there are no hazardous wastes being managed at the site these tables are NOT APPLICABLE.

## Appendix XI Compliance Plan

List of Appendices	
Appendix XI.A.1	Table XI.A.1 – Facility History for Waste Management Units
Appendix XI.E.1	Table XI.E.1 – Corrective Action Program Cost Estimate
Appendix XI.E.2.e	Table XI.E.2.e – Groundwater Monitoring Cost Estimate
Appendix XI.E.3	Table XI.E.3 – Financial Assurance Summary
CP Table I	CP Table I: Waste Management Units and Areas Subject to Groundwater Corrective Action and Compliance Monitoring
CP Table II	CP Table II: Solid Waste Management Units and/or Areas of Concern Addressed in Permit Section XI.H. for which Corrective Action Applies Pursuant to 30 TAC Section 335.167
CP Table III	CP Table III: Corrective Action Program Table of Detected Hazardous and Solid Waste Constituents and the Groundwater Protection Standard
CP Table IIIA	CP Table IIIA: Corrective Action Program Table of Indicator Parameters and the Groundwater Protection Standard
CP Table IV	CP Table IV: Compliance Monitoring Program Table of Hazardous and Solid Waste Constituents and Quantitation Limits RESERVED
CP Table IVA	CP Table IVA: Compliance Monitoring Program Table of Detected Hazardous Constituents and Groundwater Protection Standard RESERVED
CP Table V	CP Table V: Designation of Wells
CP Table VI	CP Table VI: Compliance Period for RCRA-Regulated Units
CP Table VII	CP Table VII: Reporting Requirements
CP Table VIII	CP Table VIII: Compliance Schedule
CP Attachment A	Sheet 1 of 3 Site Facility Map
	Sheet 2 of 3 SWMU Location Map
	Sheet 3 of 3 Well Location Map
CP Attachment B	RESERVED
CP Attachment C	Attachment C – Sampling and Analysis Plan

## Appendix XI Compliance Plan Part B Application

### A. Site Specific Information

1. General Site Information (provide the following information):
  - a. An overall plan view map of the entire facility delineating the facility's property boundary, Facility Operations Area (FOA) boundaries, as applicable, and the plume management zone (PMZ) boundaries as applicable;

#### **Not Applicable**

All CP Attachment A Maps should be provided in Appendix XI of the application.

- b. A 7.5 minute U.S.G.S. quadrangle topographic map showing the entire facility;  
NOTE: This information is supplemental only and is not intended to be included as figures in the final draft permit.

#### **Not Applicable**

- c. All oversized (larger than 8.5" by 11") drawings submitted in accordance with A, above, should be accompanied with legible photocopies of the reduced drawing on 8.5" by 11" sheet(s) of paper which shall be used as "CP Attachment A" maps in the final draft Permit/Compliance Plan. The applicant should title the map(s) accordingly as "CP Attachment A, Sheet 1 of xx - Facility Site Map"; "CP Attachment A, Sheet xx of xx FOA Lateral Boundary Map"; "CP Attachment A, Sheet xx of xx, PMZ Boundary Location Map"; and

#### **See CP Attachment A Sheets 1 to 3**

- d. Aerial photographs through time depicting changes in the land use, if available.  
NOTE: This information is supplemental only and is not intended to be included as figures in the final draft permit

2. Waste Management  
Provide a complete list and a plan view drawing(s) locating and identifying the following waste management units at the scale of 2.5 centimeters (1 inch) equal to not more than 61.0 meters (200 feet). All oversized (larger than 8.5" by 11") drawings should be accompanied with legible photocopies of the reduced drawing on 8.5" by 11" sheet(s) of paper. Please provide information for each waste management unit listed

below on CP Table XI.A.I. - Facility History for Waste Management Units.

All CP Attachment A Maps should be provided in Appendix XI of the application.

- a. All hazardous waste management units regulated under the Industrial Solid Waste and Municipal Hazardous Waste Rules (Chapter 335) required to be monitored in accordance with 30 TAC 335.164 (Detection Monitoring), 335.165 (Compliance Monitoring Program) and 335.166 (Corrective Action Program);

**Not Applicable**

- b. All solid waste management units (SWMUs) and Areas of Concern (AOCs) regulated under 335.167 which are recommended for further investigation and/or corrective action in the RCRA Facility Assessment (RFA) shall include those identified in accordance with the permit requirements subsequent to the initial RFA

**Not Applicable**

- c. All on site wastewater treatment units.

**Not Applicable**

3. Facility History

Based on the information provided in CP Table XI.A.I., complete CP Table I - Waste Management Units and Areas Subject to Groundwater Corrective Action and Compliance Monitoring accordingly in the format provided.

For the SWMUs or AOCs listed in CP Table XI.A.I. regulated under 30 TAC 335.167 which are recommended for further investigation and/ or corrective action in the RCRA Facility Assessment (RFA), including those identified in accordance with permit requirements subsequent to the initial RFA, complete CP Table II - Solid Waste Management Units and Areas of Concern for which Corrective Action applies pursuant to 30 TAC 335.167. CP Table II will become part of the Compliance Plan.

**See CP Table II.**

4. Site Geology, Hydrogeologic Conditions, and Relationship to Surface Water

For New, modified/amended Compliance Plan, please provide a Geology Report as required by Section VI.B of this application containing updated site geologic information including the following descriptions, maps and tables with appropriate supporting documentation [All maps should be at the scale of 1 inch equal to not more than 200 feet and legible when reduced to 8.5" by 11" letter size paper]:

- a. A description of the site geology for the facility. The geologic

description should include a site geology map and sufficient cross sections (see Item h. below) to describe the uppermost aquifer and any confining stratigraphic unit(s) beneath the site.

**Not Applicable**

- b. A description of the site soils and subsurface lithologies using the Unified Soil Classification System. For those soil units which do not extend beneath the entire site area, the soil description should include a plan view map designating the soil's areal extent;

**Not Applicable**

c. Where a soil remedy is required in a corrective action program of Section XI.D.I. of this application for a Regulated Unit, SWMU and / or AOC, the applicant shall submit a description of contamination in soils of the vadose zone (unsaturated zone above the uppermost aquifer). The soil description should include maps indicating lateral and vertical extent of contamination;

**Not Applicable**

- d. A description and designation of the uppermost saturated zone or uppermost aquifer including the name, the type of unit (e.g. perched, confined, etc.), and groundwater characteristics (flow rates, directions, hydraulic conductivity, etc.). As defined in 40 CFR 260.10, an aquifer is a geologic formation, group of formation, or part of a formation, capable of yielding significant amount of groundwater to wells or springs. Persons using Texas Risk Reduction Program (TRRP) should also consider the definition of a groundwater bearing unit as a saturated geologic formation, group of formations, or part of a formation with a hydraulic conductivity of equal to or greater than  $1 \times 10^{-5}$  centimeters/second (30 TAC 350.4(a)40).

Based on the information contained in the Geology Report, complete CP Table IX-Description of Uppermost Aquifer. CP Table IX will become part of the Compliance Plan.

**Not Applicable**

- e. Present the geologic, stratigraphic and hydrogeological information; and

**Not Applicable**

- f. Maps indicating the lateral and vertical extent of the contamination for each stratigraphic unit affected, with supporting documentation.

**Not Applicable**

- g. Current Contaminant Plume Map(s) Locating and identifying the extent of contamination as determined from previous monitoring on a separate facility base map(s). Locate and identify all monitor wells and waste management units/areas.

**Not Applicable**

- h. Cross section Cross section transect lines should be indicated on the Contaminant Plume Map. The applicant, at a minimum, must submit two (2) stratigraphic cross sections for each waste management unit/area. One cross section should be drawn through all the point of compliance wells and the second cross section should be drawn along the direction of the movement of the contaminant plume released from the unit/ area. Cross sections should follow the requirements outlined in the Geologic and Hydrogeologic Report of Parts IV and V of this application. At a minimum, the cross sections should include the following information:

1. the stratigraphic interpretation (e.g., surface grade, uppermost aquifer, aquiclude);
2. lithology/geologic description of the uppermost aquifer and aquiclude;
3. the potentiometric surface;
4. detected non-aqueous phase liquids (NAPLs) and hazardous constituents; and
5. screen length and screen depth for each well in the cross section.

**Not Applicable**

- i. Well Construction diagram The report should include a well construction diagram for all wells used in the cross section. The well construction diagram should include the information in "Attachment B" of this (Compliance Plan) application. The well construction diagram information may be included on the geologic cross-section(s).

**Not Applicable**

- j. Describe the potential for any surface water bodies to be hydraulically connected to groundwater containing hazardous constituents. Apply the guidance provided in Determining PCLs for Surface Water and Sediment, RG-366/TRRP-24 Revised, December 2002, in order to determine the water body type and applicable surface water criteria for human health, aquatic life and wildlife, as applicable.

**Not Applicable**

B. Hazardous Constituents In Groundwater And Groundwater Protection Standards

(GWPSs) Hazardous Constituents in Groundwater

For each contaminated hydrogeologic unit beneath a waste management unit/area (40 CFR 264.95), provide a list of all 40 CFR Part 264 Appendix IX hazardous constituents that have been detected in groundwater samples above background values, Practical Quantitation Limits (PQLs), or Method Quantitation Limits (MQLs). Please submit for each unit/area the most recent Appendix IX laboratory analysis results showing the constituents, constituent concentrations, methods used for analysis and associated laboratory QA/QC.

The groundwater samples (collected for the purpose of determining whether constituents listed in Appendix IX are present) shall be from each waste management unit/area monitoring well system as required by 30 Texas Administrative Code (TAC) 335.164 (detection monitoring program).

If the waste management unit/ area is subject to Corrective Action Program required by 30 TAC 335.166 or 335.167 and/or Compliance Monitoring required by 30 TAC 335.165, then list the unit/area and include the list of hazardous constituents and their principal degradation constituents in:

CP Table III - Corrective Action Program Table of Detected Hazardous and Solid Waste Constituents and the Groundwater Protection Standard; and

**See Table III.**

CP Table IV - Compliance Monitoring Program Table of Hazardous and Solid Waste Constituents and Practical Quantitation Limits or Method Quantitation Limits for Compliance Monitoring.

1. Groundwater Protection Standards (GWPSs)  
The GWPS (30 TAC 335.158) is designed to ensure that hazardous constituents (30 TAC 335.159) identified in groundwater and their principal degradational constituents do not exceed concentrations that pose a present or potential hazard to human health and the environment. Compliance monitoring and corrective action programs for a Regulated Unit (30 TAC 335.165 and 335.166) and a corrective action program for a solid waste management unit (SWMU) (30 TAC 335.167) require human health and the environment to be protected from all releases of hazardous wastes and constituents. These corrective action and monitoring programs are evaluated using the GWPS. The GWPS is based on the following criteria.
  - a. Background Levels Background levels authorized under 30 TAC 335.160(a)
    - (1) are defined as constituent concentration values that are naturally occurring or are not influenced by contamination coming from the waste management unit. These values are established by statistical analysis of upgradient well sampling data. Analytical results from a sufficient number of independent samples are required to be utilized with an approved and appropriate statistical method. For guidance on the statistical methods consult, Statistical Analysis of Groundwater Data at

RCRA Facilities-Unified Guidance, U.S. EPA, March 2009, and any subsequent updates to this document.

Practical Quantitation Limits (PQLs) or Method Quantitation Limits (MQLs) are utilized in lieu of background values unless a background demonstration establishes concentrations for naturally occurring constituents. The PQL or MQL is defined in the footnote of CP Tables III and IV.

- b. Primary and Secondary Maximum Contaminant Levels (MCLs) Maximum permissible level of a contaminant in water which is delivered to any user of a public water system (40 CFR Part 141 and 143, Federal Safe Drinking Water Act).
  - c. Alternate Concentration Limits (ACLs) determined in accordance with 30 TAC 335.160(b) and are defined in footnote of CP Tables III and IV.
2. Establishing the Groundwater Protection Standard (GWPS)
- a. If background, PQL or MQLs are proposed for the GWPS, the applicant must list all constituents (i.e., detected and degradational constituents) for which a GWPS is being applied for and the appropriate concentration limits. This information shall be submitted in the format of CP Tables III, and IV.

Alternate Concentration Limits (ACLs) ACLs are established at the point of compliance (POC) for a regulated or solid waste management unit (SWMU). All concentration values or limits listed in Section XI.B.I.c. are considered ACLs. ACLs are evaluated in accordance with the provisions of 30 TAC 335.160(b) and other regulations acceptable to the executive director. If an ACL is requested on the basis of Section XI.B.I.c. (MCLs), then no ACL demonstration is necessary. The ACL demonstration must establish constituent concentrations in groundwater in accordance with regulations acceptable to the executive director. This information shall be submitted in the format of CP Tables III and IV. Note that depending upon the rule employed [i.e., 30 TAC 335 Subchapter S - Risk Reduction Rules (RRR) or 30 TAC 350 - Texas Risk Reduction Program (TRRP)], the applicant should determine the GWPS for the point of compliance and point of exposure, as applicable, in accordance with the remedy standard being utilized.

- b. If the contaminant plume discharges or has a potential to discharge into surface water, then the facility must also comply with 30 TAC Chapter 307 (Texas Surface Water Quality Standards) unless other regulatory requirements acceptable to the executive director are requested.

**CP Table IV does not apply.**

### C. Compliance Monitoring Program

**This submittal is a renewal of existing plan and no changes are required to the existing Compliance Monitoring Program.**

As required by 30 TAC 335.165, an owner or operator must monitor the groundwater to determine whether Regulated Units are in compliance with the Groundwater Protection Standard (GWPS) under 30 TAC 335.158. The applicant must provide the following information when proposing a compliance monitoring program.

1. Groundwater Monitoring Program Description
  - a. Describe the proposed groundwater monitoring system to be used to monitor compliance with the GWPS which includes the following information.
    - (1) Changes, if applicable, from the current detection monitoring system or compliance monitoring system groundwater monitoring program at the waste management unit that will be required to comply with the compliance monitoring program described in 30 TAC 335.165. This description should address changes concerning:
      - (a) Geological and/or hydrogeological information differences since the submittal of the previous application [must submit an updated Geologic and Hydrogeologic Report required by Section XI.A.4];
      - (b) Waste management areas/units;
      - (c) Construction details for monitor wells to evaluate compliance with "Attachment B" well specification requirements;
      - (d) The number and locations of additional monitor wells [also see Section XI.C.1.b.(2)];
      - (e) Sample handling, chain of custody, and analytical procedures (also see "Attachment C");
      - (f) Frequency of monitoring;
      - (g) Monitoring parameters;
      - (h) Evaluation of compliance with GWPS (Statistical Methods);
      - (i) Other Sampling and Analysis Plan information to be compliant with "Attachment C";
      - (j) Compliance period as defined in Section XI.E.1.c. of the application;
      - (k) Financial assurance (see Section XI.E.); and
      - (l) An ACL variance under 30 TAC 335.160(b), if applicable.
    - Not Applicable**
    - (2) The number, depth and location of all monitor wells (Background Wells, Point of Compliance Wells, Observation Wells, Piezometers, etc.). Complete CP Table V – Designation of Wells by Function and make changes as applicable to plans referenced in Section XI.C.1.b.  
**Not Applicable**
    - (3) The proposed hazardous constituent monitoring list which is based on constituents that were monitored during detection monitoring (if applicable), constituents detected in accordance with 30 TAC 335.164, and degradational constituents identified in CP Table III accordingly to develop the constituent list for the Corrective Action Monitoring Program. CP Table III shall become part of the final Compliance Plan.  
**CP Table III is Not Applicable.**
    - (4) The proposed indicator parameter monitoring list. From the list of

constituents and GWPS identified in CP Table III complete CP Table IIIA - Corrective Action Program Table of Indicator Parameters and the Groundwater Protection Standard, accordingly. CP Table IIIA shall become part of the Compliance Plan to be analyzed at least semiannually as required by 30 TAC 335.166(7).

**Please see CP Table III and CP Table IIIA.**

- (5) Frequency of monitoring should be specified in CP Table VIII

**CP Table VIII is Not Applicable because no changes are being made to the currently approved Compliance Plan.**

- (6) Provisions for reporting groundwater data at least on an annual basis should be specified in CP Table VII

**Please see CP Table VII.**

- (7) Annual determination of contamination plume rate and direction of migration.

- (8) Compliance period. Calculate the compliance period as required by 30 TAC 335.162 and 335.165(1)(d). Include calculations and complete CP Table VI - Compliance Period for RCRA-Regulated Units which shall become part of the final Compliance Plan

- b. Submit the following plans and reports.

- (1) Current Sampling and Analysis Plan. The Sampling and Analysis Plan must include information required by 30 TAC 335.163(4) and 335.163(5) and 40 CFR Subpart 270.30(j). For guidance, please see "Attachment C" to the application.

**Please see CP Attachment C Sampling and Analysis Plan.**

- (2) Monitoring System Plan If the applicant is proposing a monitoring well or a monitoring system in the application, the applicable well installation specifications outlined in "Attachment B" of this application should be followed. All new monitoring wells must be installed in accordance with the specifications outlined in "Attachment B", unless an alternative design is approved by the agency prior to installation. If the applicant proposes as part of the monitoring system, any well (existing or proposed) that does not meet or exceed the requirements outlined in "Attachment B", then the proposed alternative design must be described in detail in the Monitoring System Plan and must be submitted with this application. The Monitoring System Plan must include:

- (a) Monitoring System Design and Specifications Certified by a qualified engineer and/or geologist which provides detailed

- plans and specifications on the monitoring system design;  
and  
(b) Well Drilling and Well Casing Specifications Certified by a qualified engineer and/or geologist which provides details on well casing specification, drilling logs and reports.

**Not Applicable**

- (3) Current Geologic and Hydrogeologic Report Provide a report per Section X.I.A.4 of this application discussing the geologic and hydrogeologic conditions of the facility and the specific area affected by the waste management areas. This report should include the most up-to-date information from which the design of the groundwater monitoring system was based.

**Not Applicable**

2. Waste Management Units Monitored
- a. Delineate and identify the following for each waste management unit in the proposed groundwater monitoring program.
1. Boundary of the waste management unit and, if applicable, the proposed waste management area which includes more than one waste management unit (identify all waste management units which are included in the waste management area). These waste management units subject to compliance monitoring should be listed in CP Table I - Waste Management Units and Areas Subject to Groundwater Corrective Action and Compliance Monitoring which shall become part of the final Compliance Plan.
  2. The proposed point of compliance (30 TAC 335.161) and point of exposure wells.
  3. Any other proposed monitor wells such as supplemental wells, observation wells, background wells, etc. If appropriate the groundwater monitoring system should have a sufficient number of wells be designated to monitor the downgradient extent of the plume.
  4. Features which may serve as conduits for subsurface contamination.
- b. For each waste management unit/area in the proposed groundwater monitoring system, submit the locations of individual waste management unit/area monitor wells (existing or proposed) and any soil borings plugged and unplugged specifically drilled for assessment of contamination. These individual monitor wells shall be identified by respective well number on a plan view drawing and only the background, point of compliance and/or point of exposure wells should be indicated in CP Table V - Designation of Wells by Function. The plan view map depicting the location of individual monitoring wells for compliance monitoring should be labeled as "CP Attachment A, sheet xx of xx" in the text box. The title box should also include reference to the facility name, Permit/Compliance Plan Number, Solid Waste Registration Number, Unit Description or name with Notice of

Registration (NoR) Unit No. 0000. The "CP Attachment A" map(s) and CP Table V shall also become part of the final Compliance Plan.

3. Implementation Schedule

Itemize and discuss, in detail, the estimated time schedule necessary for any testing and assessments, system design, construction and installation, and final implementation of the groundwater monitoring program for each Regulated Unit and solid waste management unit. If the schedule of implementation for items are not completed at the time of the application or are not completed at the time of issuance of the final draft Permit/Compliance Plan, then the items should be added to the CP Table VIII - Compliance Schedule of the application.

**Not Applicable**

D. Corrective Action Program – **Not Applicable**

E. Cost Estimates For Financial Assurance

As required by 30 TAC 335.156 and 335.167, the applicant must provide cost estimates for groundwater monitoring and corrective action to determine the amount of financial assurance. Please complete the applicable parts of this form. Cost estimates should be filled out for each proposed corrective action/monitoring system at the site; or any additional corrective action system not covered in this Part. Please note, the Executive Director may request from the applicant documentary evidence for cost estimates.

If an item is not applicable, please mark it NA.

General Information:

1. For each Waste Management Area (WMA) list the following:

- a. A description of the waste management unit(s) in the WMA (e.g., landfill, surface impoundment, land treatment);

**All WMAs are closed at the facility.**

- b. The NoR unit number(s) in the WMA; and the compliance period for the WMA listed above.

Year(s) = \_\_\_\_\_

- c. (The compliance period is the number of years equal to the active life of the waste management area as defined in 30 TAC 335.162).
- d. In instances where the compliance period is equal to or exceeds 30 years, the maximum amount of financial assurance required will be based on 30 years because the required post-closure care period to perform corrective action and groundwater monitoring is 30 years. In instances where the compliance period is less than 30

years, the financial assurance for corrective action or compliance monitoring will be based on the longest time frame established by one of the following criteria:

- (1) The duration of your compliance plan;
- (2) The time frame for clean-up based on model projections and historical data as approved by the Executive Director; or
- (3) The compliance period for the unit/area/  
Total Years Used to Calculate the Financial Assurance for the  
Corrective Action and/or Compliance Monitoring Program  
Year(s) = 10

2. Please complete Table XI.E.1. – Corrective Action Program Cost Estimate.

**Not Applicable**

3. Please complete Table XI.E.2. – Groundwater Monitoring Cost Estimate.

**See Appendix XI.E.2.e - Table XI.E.2.e**

4. Please complete Table XI.E.3. – Financial Assurance Summary.

**See Appendix XI.E.3 - Table XI.E.3.**

**Table XI.A.1. - Facility History for Waste Management Units**

Name of Waste Management Unit <sup>1</sup>	Type of Waste Management Unit	Notice of Registration Unit Number	Date Waste Was <i>First</i> Placed in Unit	EPA Waste Code	Estimated Capacity of Unit	Quantity of Waste Left in Place	Date Waste Was Last Placed in Unit <sup>2</sup>	Date of Unit Closure or Projected Closure	Date Unit Certified Closed <sup>3</sup>	Is There Evidence of a Release of Hazardous Constituent(s) <sup>4</sup> to Groundwater? (Yes, No, or Unknown)
1	Storage for groundwater treatment system and groundwater monitoring	SWMU No. 6 & 7	N/A	03011011 20041141	515	0	2014			Not from these units

**Footnotes:**

1. Indicate by asterisk (\*) those waste management units that have received any hazardous waste constituent listed in Appendix VIII of 40 CFR Part 261.
2. For the purposes of this Compliance Plan Application, a waste management unit receiving hazardous waste after July 26, 1982, shall be considered a RCRA-regulated Unit. A waste management unit that ceased receiving hazardous waste on or before that date shall be considered a Solid Waste Management Unit (SWMU).
3. The date the applicant submitted certification of closure to the Commission.

4. Hazardous constituents are those hazardous constituents listed in Appendix IX of 40 CFR Part 264.

**Table XI.E.1. Corrective Action Program Cost Estimate**

Task	Cost
<b>1. Pumping Capacity Per Year:</b>	
A. Daily average system pumping rate	gal/day
B. Annual groundwater volume recovered	gal/yr
<b>2. Off-Site Liquid Treatment / Disposal Cost:</b>	
A. Volume of treated contaminated water to be disposed of off-site yearly	50 gal/yr
B. Transportation of liquid waste disposed of off-site yearly	
(1) Transportation cost per gallon	5 \$/gal
(2) Gallons of contaminated water shipped per year	50 gal/yr
(3) Annual cost of transportation (1 x 2)	250 \$/yr
C. On-site yearly storage cost prior to off-site disposal	50 \$/yr
D. Off-site yearly treatment cost of liquid waste	
(1) Treatment charge per gallon	0.40 \$/gal
(2) Total volume to be treated per year	50 gal/yr
(3) Annual treatment cost (1 x 2)	20 \$/yr
E. Off-site disposal cost of liquid waste per year	
(1) Disposal charge per gallon	\$/gal
(2) Total volume to be disposed per year	gal/yr
(3) Annual disposal cost (1 x 2)	\$/yr
<b>Annual Off-Site Liquid Treatment / Disposal Cost</b> (2B3 + 2C + 2D3 + 2E3)	<b>320 \$</b>
<b>3. On-site Wastewater Treatment System Cost and On-site Treatment / Disposal Cost:</b>	
Submit a cost estimate for a treatment system specifically designed and used exclusively for the groundwater Corrective Action Program and operational after some start up maintenance. Estimates to clean out the system should also be included in the following cost.	
A. Initial capital expenditure for treatment system including start up maintenance	\$
<b>On-Site Wastewater Treatment System Capital Cost (3A)</b>	<b>\$</b>

B. Gallons of contaminated water to be treated on-site per year	gal/yr
C. Cost of on-site treatment per gallon	\$/gal
D. Cost of sludge or solids disposal per year	\$/yr
E. Cost per year of maintenance on treatment system and recovery system, along with any additional equipment and repairs needed for the systems	\$/yr
F. Cost of on-site disposal per year	\$/yr
<b>Annual On-Site Treatment / Disposal Cost</b> [(3B x 3C) + 3D + 3E + 3F]	<b>\$</b>
<b>4. Inspections, Maintenance and Operation Cost for the Corrective Action Program:</b>	
A. Operator's time on-site for inspections and maintenance per year	hr/yr
B. Charge of salary per hour	\$/hr
C. Annual cost of labor (4A x 4B)	\$/yr
D. Replacement cost of parts and equipment per year	\$/yr
E. Electricity cost per year	\$/yr
<b>Annual Inspections / Maintenance / Operation Cost for the Corrective Action Program (4C + 4D + 4E)</b>	<b>\$</b>

<b>Table XI.E.2.e - Groundwater Monitoring Cost Estimate</b>	
<b>1. Annual Sampling and Analysis Cost:</b>	
<b>A. Background Wells</b>	
(1) Number of wells	
(2) Sample analysis cost per well	0 \$/well
(3) Number of sampling events per year	0 /yr
(4) Sampling cost (1 x 2 x 3)	0
<b>B. Point of Compliance Wells</b>	
(1) Number of wells	4
(2) Sample analysis cost per well	\$150.00 \$/well
(3) Number of sampling events per year	2 /yr
(4) Sampling cost (1 x 2 x 3)	1,200.00
<b>C. Recovery Wells</b>	
(1) Number of wells	0
(2) Sample analysis cost per well	\$0.00 \$/well
(3) Number of sampling events per year	0 /yr
(4) Sampling cost (1 x 2 x 3)	0
<b>D. Corrective Action Observation Wells</b>	
(1) Number of wells	0
(2) Sample analysis cost per well	\$0.00 \$/well
(3) Number of sampling events per year	0 /yr
(4) Sampling cost (1 x 2 x 3)	\$0.00
<b>E. Point of Exposure Wells</b>	
(1) Number of wells	4
(2) Sample analysis cost per well	\$150.00 \$/well
(3) Number of sampling events per year	2 /yr
(4) Sampling cost (1 x 2 x 3)	\$1,200.00
<b>F. Supplemental Wells</b>	
(1) Number of wells	4
(2) Sample analysis cost per well	\$150.00 \$/well

<b>Table XI.E.2.e - Groundwater Monitoring Cost Estimate</b>		
(3) Number of sampling events per year	2	/yr
(4) Sampling cost (1 x 2 x 3)	\$1,200.00	
<b>G. Field Quality Control Sampling</b>		
(1) Number of wells	1	
(2) Sample analysis cost per well	\$150.00	\$/well
(3) Number of sampling events per year	2	/yr
(4) Sampling cost (1 x 2 x 3)	\$300.00	
<b>2. Sampling Labor Cost:</b>		
A. Hours of sampling per well	1	hrs/well
B. Number of sampling technicians per well	2	/yr
C. Charge per hour	\$50.00	\$/hr
D. Total number of wells to be sampled annually		
E. Total number of wells sampled semi-annually	4	
F. Total number of wells sampled quarterly		
G. Total number of wells sampled monthly		
H. Total number of wells sampled per year (2D) + (2E x 2) + (2F x 4) + (2G x 12)	8	
I. Sampling Labor Cost (2A x 2B x 2C x 2H)	\$800.00	
<b>*Annual Groundwater Monitoring Cost</b>	<b>\$4,700.00</b>	
<b>3. Well Installation (typical cost):</b>		
A. Monitor well installation cost per well	\$0.00	\$/well
B. Number of monitor wells to be installed	0	
C. Cost of monitor well system (A x B)	\$0.00	
D. Recovery well installation cost per well	\$0.00	\$/well
E. Number of Recovery Wells to be installed	0	
F. Cost of Recovery well system (D x E)	\$0.00	
<b>*Total Well Installation Cost (3C + 3F)</b>	<b>0</b>	
<b>4. Administrative Cost:</b>		
A. Annual cost for record-keeping and report preparation	\$5,000.00	

<b>Table XI.E.2.e - Groundwater Monitoring Cost Estimate</b>	
<b>*Annual Administrative Cost (4A)</b>	\$5,000.00    \$
<b>5. Inspection and Maintenance Cost for the Monitoring Program:</b>	
A. Operator's time (hours) on-site for inspections and maintenance per year	52
B. Charge or salary per hour	50
C. Annual cost of labor (4A x 4B)	\$2,600
D. Replacement of parts and equipment per year	\$1,000
<b>*Annual Inspections / Maintenance Cost for the Groundwater Monitoring Program (5C + 5D)</b>	<b>\$3,600.00</b>

**Table XI.E.3. - Financial Assurance Summary**

Task	Cost
Annual Off-Site Liquid Treatment / Disposal Cost	\$320.00
Annual On-Site Treatment / Disposal Cost	\$0.00
Annual Inspection / Maintenance / Operation Cost For The Corrective Action Program	\$0.00
Annual Groundwater Monitoring Cost	\$4,700.00
Annual Administrative Cost	\$5,000.00
Annual Inspection And Maintenance Cost For The Groundwater Monitoring Program	\$3,600.00
<b>Annual Sub Total</b>	<b>\$13,620.00</b>
Total Years Used For Calculating Financial Assurance for Corrective Action and/or Compliance Monitoring Program	<b>10 Years</b>
Remediation Cost (Annual Sub Total x Total Years Used)	\$136,200.00
On-Site Waste Water Treatment System Capital Cost Total Well Cost	\$0.00
10% Contingency	\$13,620.00
Total Cost	
<b>Grand Total Cost (round to nearest \$1000)</b>	<b>\$150,000.00</b>

**CP Table I - Waste Management Units and Areas Subject to Groundwater Corrective Action and Compliance Monitoring**

A. Corrective Action<sup>1</sup> (30 TAC Section 335.166)

Unit Name	Notice of Registration (NOR) Number, if applicable	Date Program Requirement and Remedy Standard Completed <sup>4</sup>
Historic spillage area	SWMU #6 & #7	Reserved

B. Compliance Monitoring<sup>1</sup> (30 TAC Section 335.165)

Unit Name	Notice of Registration (NOR) Number, if applicable	Date Program Requirement and Remedy Standard Completed <sup>4</sup>
RESERVED		

C. Corrective Action<sup>2</sup> (30 TAC Section 335.167)

Unit Name	Notice of Registration (NOR) Number, if applicable	Date Program Requirement and Remedy Standard Completed <sup>4</sup>
RESERVED		

D. Alternative Corrective Action<sup>3</sup> (30 TAC Section 335.151)

Unit Name	Notice of Registration (NOR) Number, if applicable	Date Program Requirement and Remedy Standard Completed <sup>4</sup>
RESERVED		

E. Facility Operations Area (FOA)<sup>4</sup> (30 TAC Section 335.156 and Chapter 350)

Unit Name	Notice of Registration (NOR) Number, if applicable	Date Program Requirement and Remedy Standard Completed <sup>4</sup>
RESERVED		

**Foot Note:**

1. Program applies to RCRA-regulated units only.

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2. Program applies to releases from solid waste management units (SWMUs) and/or areas of concern (AOCs).
3. Program applies to commingled releases from RCRA-regulated unit and from one or more SWMUs and/or AOCs.
4. List SWMUs, additional units/areas of Investigation, AOCs, RCRA-regulated units within the FOA that are subject to corrective action. For RCRA units, SWMUs and/ or AOC outside the FOA boundary for which compliance monitoring and/ or corrective action applies should be listed separately in Items A, B or C as appropriate.
5. For the purpose of maintaining a historical record to verify the units/areas have met the program requirements in accordance with Permit Provisions XI.A.2, XI.A.3., XI.A.4. and/or XI.A.5., the permittee shall update CP Table I to reflect the new status of the unit/area to include the remedy standard achieved for all media of concern and the date of the Commission's No Further Action (NFA) approval letter. The units/area shall not be deleted from CP Table I until the program objectives have been completed and no further action has been approved through modification or amendment to the Permit.

**CP Table II: Solid Waste Management Units and/or Areas of Concern  
Addressed in Permit Section XI.H. for which Corrective Action Applies Pursuant to 30 TAC  
Section 335.167**

Unit Name	NOR Number, if applicable	SWMU or AOC	Affected Media <sup>1</sup>	Date Program Requirement and Remedy Standard Completed <sup>2</sup>
Historic spillage area	#6 & #7	6 & 7	Groundwater	Reserved

**SWMU= Solid Waste Management Units**

**AOC= Area of Concern**

**Foot Note:**

1. Specify the affected media [i.e. soil, groundwater (GW), surface water (SW), sediment (SED)].
2. For each SWMU or AOC, specify the Remedy Standard that was completed and the date of the Commission's No Further Action (NFA) letter for the media of concern.
3. For sites with FOA authorization, list the SWMUs and/or AOCs that are subject to corrective action at the site. Please separate the SWMUs and/or AOCs that are located within the FOA boundary from the SWMUs and/or AOCs that are located outside of the FOA boundary.

**Note:**

CP Table II lists SWMUs and/or AOCs which have been identified in the RCRA Facility Assessment (RFA) Report as having a release(s) or a potential release(s) of hazardous waste, hazardous constituents, or other constituents of concern. The permittee is thus required to meet Corrective Action Objectives for the SWMUs and/or AOCs in accordance with Permit Section XI.H. and 30 TAC Section 335.167.

The permittee shall update CP Table II when a new SWMU and/or AOC that requires corrective action is identified. The permittee shall also update CP Table II as outlined in Footnote 2 when the corrective action status of a media for a SWMU or AOC has changed.

SWMUs and/or AOCs shall not be deleted from this table when the Corrective Action Objectives have been completed and a No Further Action (NFA) determination has been approved for the SWMU and/or AOC. In accordance with Permit Section XI.H., CP Table II is intended to be a historical record of the facility's corrective actions and to reflect when the Corrective Action Objectives have been met for each SWMU/AOC.

There may be cases in which the permittee fulfills the Corrective Action Objectives for soils at a SWMU/AOC, but long-term groundwater monitoring and corrective action may be necessary to meet the groundwater Corrective Action Objectives. In such instances, the SWMU/AOC would be listed in CP Table I, Item C, and would be subject to all applicable provisions of this Compliance Plan. If a release from a SWMU/AOC is commingled with a RCRA-regulated unit,

then the unit and the SWMU/AOC would be listed in CP Table I, Item D. In accordance with Permit Section XI.H., once the Corrective Action Objectives for groundwater are completed, the permittee shall modify or amend the Compliance Plan to reassign the SWMU/AOC in CP Table I, Item C or Item D, to CP Table II. CP Table II should reflect the new status of the SWMU/AOC. It should include the Remedy Standard achieved for all media of concern and the date of the Commission's NFA approval letter for each SWMU/AOC.

**CP Table III: Corrective Action Program Table of Detected Hazardous and Solid Waste Constituents and the Groundwater Protection Standard 50260**

Unit Name	Column A Hazardous Constituents	Column B Groundwater Protection Standards (mg/l) at the POC <sup>2</sup>		Column C Groundwater Protection Standards (mg/l) at the POE or APOE, or FBOC <sup>1,2</sup>	
Historic spillage area	Acetone	22	GW GW ING	0.00	
	Benzene	0.005	GW GW ING	0.00	
	2-Butanone (MEK)	15	GW GW ING	0.00	
	Chlorobenzene	0.1	GW GW ING	0.00	
	Chloroethane	9.8	GW GW ING	0.00	
	Chloroform	0.24	GW GW ING	0.00	
	1,2 Dichlorobenzene	0.60	GW GW ING	0.00	
	1,4 Dichlorobenzene	0.075	GW GW ING	0.00	
	1,1 Dichloroethane	4.9	GW GW ING	0.00	
	cis-1,2- Dichloroethene	0.070	GW GW ING	0.00	
	trans-1,2- Dichloroethene	0.10	GW GW ING	0.00	
	Ethylbenzene	0.70	GW GW ING	0.00	
	1,1,1,2- Tetrachloroethane	0.035	GW GW ING	0.00	
	1,1,2,2- Tetrachloroethane	0.0046	GW GW ING	0.00	
	1,1,1-Trichloroethane	0.2	GW GW ING	0.00	
	Trichloroethene	0.005	GW GW ING	0.00	
	Toluene	1.0	GW GW ING	0.00	
	Vinyl Chloride	0.002	GW GW ING	0.00	
	Xylenes	10.0	GW GW ING	0.00	
	Chromium	0.10	GW GW ING	0.00	
	Lead	0.015	GW GW ING	0.00	

Notes:

- If the Corrective Action Program (Provision XI.E.) does not apply to the RCRA-regulated units, SWMUs, or AOCs at the facility, mark "Reserved" next to the CP Table III heading.
- CP Table III represents the long list of hazardous constituents that are reasonably expected to be in, or derived from, the waste placed in each RCRA-regulated unit, SWMU, and/or AOC listed in the table. CP Table III also lists the hazardous constituents that have been historically detected in the groundwater for each RCRA-regulated unit, SWMU, and/or AOC. These hazardous constituents are monitored in accordance with Provision XI.F.3.c.(1).
- In accordance with Provision XI.D.6., the Groundwater Protection Standards (GWPS) must be met before the RCRA-regulated unit, SWMU, and/or AOC can exit the Corrective Action Program.
- If applicable, "Appendix IX" can be used in Column A for a unit instead of listing each chemical of

concern (COC). The permittee may petition the Executive Director for the deletion of a specific COC from the Appendix IX analysis if the permittee can demonstrate that the COC was never used in the facility's operations nor was disposed of in the waste management area.

- e) Attenuation monitoring point (AMP) wells, corrective action system (CAS) wells, and corrective action observation (CAO) wells should not be listed in CP Table III. These wells should only be depicted in the CP Attachment A maps. Once an AMP, CAS, or CAO well meets its respective attenuation action levels (AALs) or GWPS, then the Permittee may propose to discontinue monitoring that well without modification to the Permit. If the AMP, CAS, or CAO well is listed in CP Table III, then any proposed change to the well would require modification to the Permit. Changes to the wells depicted in the CP Attachment A maps can be approved in the Groundwater Monitoring Report required by CP Table VII and become a part of the Permit by reference.

Footnotes:

1. Use Column C to specify the GWPS assigned at a POE or APOE (i.e. for sites with MNA or PMZ proposals as applicable under TRRP), or FBOC for those sites with FOA authorization. Put "N/A" if a specific program or column item is not applicable.
2. For each COC, select the appropriate GWPS designation and definition to demonstrate that the corrective action program objectives are being achieved either under the Risk Reduction Rules (RRR) pursuant to 30 TAC Chapter 335 or the Texas Risk Reduction Program (TRRP) pursuant to 30 TAC Chapter 350. The RRR and TRRP GWPS designations and definitions may not be combined pursuant to 30 TAC Section 350.2(m).

<sup>GW</sup> GW <sub>Ing</sub>	ACL pursuant to 30 TAC Section 335.160(b) based upon the PCL determined under RSA or RSB (Residential or Commercial /Industrial) for Class 1 or Class 2 groundwater ingestion PCL of 30 TAC Chapter 350. The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table. In accordance with 30 TAC Section 350.72(b), <sup>GW</sup> GW <sub>Ing</sub> PCLs may need to be adjusted to lower concentrations to meet the cumulative carcinogenic risk level (less than or equal to $1 \times 10^{-4}$ ) and hazard index criteria (less than or equal to 10) when there are more than 10 carcinogenic and/or more than 10 noncarcinogenic chemicals of concern within a source medium.
<sup>GW</sup> GW <sub>Class3</sub>	ACL pursuant to 30 TAC Section 335.160(b) based upon the PCL determined under RSA or RSB (Residential or Commercial /Industrial), Tier I for Class 3 groundwater ingestion PCL of 30 TAC Chapter 350. The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table.
<sup>Air</sup> GW <sub>Inh-V</sub>	ACL pursuant to 30 TAC Section 335.160(b) based upon the PCL determined under RSA or RSB (Residential or Commercial /Industrial) for Class 1 or Class 2 groundwater inhalation PCL of 30 TAC Chapter 350. The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table.
<sup>SW</sup> GW	ACL pursuant to 30 TAC Section 335.160(b) based upon the PCL determined under RSA or RSB for groundwater-to-surface water PCL of 30 TAC Chapter 350. The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table.
<sup>SED</sup> GW	ACL pursuant to 30 TAC Section 335.160(b) based upon the PCL determined under RSA or RSB for groundwater-to-sediment PCL of 30 TAC Chapter 350. The PCL value, Column B,

will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table.

<sup>ECO</sup>GW

ACL pursuant to 30 TAC Section 335.160(b) based upon the PCL determined under RSA or RSB for groundwater based on ecological receptor(s) PCL of 30 TAC Chapter 350. The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table.

BKG

Background as determined in accordance with Provision XI.F.1.

ND

Non-detectable at the method quantitation limit (MQL) as determined by the analytical methods of the most recent edition of EPA SW-846 and as listed in the July 8, 1987 edition of the Federal Register and later editions. MQL is indicated in parentheses. MQL is defined in 30 TAC Section 350.4 (54) as the lowest non-zero concentration standard in the laboratory's initial calibration curve and is based on the final volume of extract (or sample) used by the laboratory.

**CP Table IIIA: Corrective Action Program Table of Indicator Parameters and the Groundwater Protection Standard**  
50260

Unit Name	Column A Hazardous Constituents	Column B Groundwater Protection Standards (mg/l) at POC <sup>2</sup>		Column C Groundwater Protection Standards (mg/l) at the POE or APOE, or FBOC <sup>1,2</sup>	
1. Historic spillage area	Benzene	0.005	GW GW ING	0.00	
	Chlorobenzene	0.1	GW GW ING	0.00	
	1,2 Dichlorobenzene	0.60	GW GW ING	0.00	
	1,4 Dichlorobenzene	0.075	GW GW ING	0.00	
	cis-1,2- Dichloroethene	0.070	GW GW ING	0.00	
	trans-1,2- Dichloroethene	0.10	GW GW ING	0.00	
	Ethylbenzene	0.70	GW GW ING	0.00	
	1,1,1-Trichloroethane	0.2	GW GW ING	0.00	
	Toluene	1.0	GW GW ING	0.00	
	Vinyl Chloride	0.002	GW GW ING	0.00	
	Xylenes	10.0	GW GW ING	0.00	
	Chromium	0.10	GW GW ING	0.00	
	Lead	0.015	GW GW ING	0.00	
	1,1 Dichloroethane	4.9	GW GW ING	0.00	

**Notes:**

- If the Corrective Action Program (Provision XI.E.) does not apply to the RCRA-regulated units, SWMUs, or AOCs at the facility, mark "Reserved" next to the CP Table III heading.
- CP Table III represents the long list of hazardous constituents that are reasonably expected to be in, or derived from, the waste placed in each RCRA-regulated unit, SWMU, and/or AOC listed in the table. CP Table III also lists the hazardous constituents that have been historically detected in the groundwater for each RCRA-regulated unit, SWMU, and/or AOC. These hazardous constituents are monitored in accordance with Provision XI.F.3.c.(1).
- In accordance with Provision XI.D.6., the Groundwater Protection Standards (GWPS) must be met before the RCRA-regulated unit, SWMU, and/or AOC can exit the Corrective Action Program.
- If applicable, "Appendix IX" can be used in Column A for a unit instead of listing each chemical of concern (COC). The permittee may petition the Executive Director for the deletion of a specific COC from the Appendix IX analysis if the permittee can demonstrate that the COC was never used in the facility's operations nor was disposed of in the waste management area.
- Attenuation monitoring point (AMP) wells, corrective action system (CAS) wells, and corrective action observation (CAO) wells should not be listed in CP Table III. These wells should only be depicted in the CP Attachment A maps. Once an AMP, CAS, or CAO well meets its respective attenuation action levels (AALs) or GWPS, then the Permittee may propose to discontinue

monitoring that well without modification to the Permit. If the AMP, CAS, or CAO well is listed in CP Table III, then any proposed change to the well would require modification to the Permit. Changes to the wells depicted in the CP Attachment A maps can be approved in the Groundwater Monitoring Report required by CP Table VII and become a part of the Permit by reference.

**Footnotes:**

1. Use Column C to specify the GWPS assigned at a POE or APOE (i.e. for sites with MNA or PMZ proposals as applicable under TRRP), or FBOC for those sites with FOA authorization.

Put "N/A" if a specific program or column item is not applicable.

2. For each COC, select the appropriate GWPS designation and definition to demonstrate that the corrective action program objectives are being achieved either under the Risk Reduction Rules (RRR) pursuant to 30 TAC Chapter 335 or the Texas Risk Reduction Program (TRRP) pursuant to 30 TAC Chapter 350. The RRR and TRRP GWPS designations and definitions may not be combined pursuant to 30 TAC Section 350.2(m).

ACL = alternative concentration limit; PQL = practical quantitation limit; PCL = protective concentration level; RSA = Remedy Standard A; RSB = Remedy Standard B

**CP Table IV: Compliance Monitoring Program Table of Hazardous and Solid Waste Constituents and Quantitation Limits**

Unit Name	Column A Hazardous Constituents	Column B Concentration Limits (mg/L) <sup>1,2</sup>	
RESERVED			

**Notes:**

- a) If there are no RCRA-regulated units subject to the Compliance Monitoring Program pursuant to 30 TAC Section 335.165, delete the contents of the table and add “Reserved” to the first row of CP Table IV.
- b) CP Table IV represents the long list of hazardous constituents that are reasonably expected to be in, or derived from, waste placed in a RCRA-regulated unit but may not be detected in the groundwater above the chemical of concern’s (COC) concentration limit.
- c) If applicable, “Appendix IX” can be used in Column A for a RCRA-regulated unit instead of listing each COC. The Permittee may petition the Executive Director for the deletion of a specific COC from the Appendix IX analysis if the Permittee can demonstrate that the COC was never used in the facility’s operations nor was disposed of in the unit.
- d) CP Table IV chemicals of concern (COCs) are to be monitored annually in accordance with Provision XLF.3.c(2)(b). Any CP Table IV COCs detected in the groundwater at a concentration greater than the COC’s concentration limit should be added to CP Table IVA through permit modification or amendment.

**Footnotes:**

- 1. Use Column B to specify the concentration limit assigned at the point of compliance (POC).
- 2. For each COC, include the appropriate concentration limit designation according to either the Risk Reduction Rules (RRR) pursuant to 30 TAC Chapter 335 or the Texas Risk Reduction Program (TRRP) pursuant to 30 TAC Chapter 350. The RRR and TRRP concentration limit designations and definitions may not be combined pursuant to 30 TAC Section 350.2(m).

RRR Concentration Limit Designations and Definitions

ND Non-detectable at the practical quantitation limit (PQL) as determined by the analytical methods of the EPA SW-846 most recent edition, and as listed in the July 8, 1987, edition of the Federal Register and later editions. The PQL is the lowest concentrations of analytes in groundwater that can be reliably determined within specified limits of precision and accuracy by the indicated methods under routine laboratory operating conditions.

BKG Background as determined in accordance with Provision XI.F.1.

TRRP Concentration Limit Designations and Definitions

ND Non-detectable at the method quantitation limit (MQL) as determined by the analytical methods of the EPA SW-846 most recent edition, and as listed in the July 8, 1987, edition of the Federal Register and later editions. The MQL is defined in 30 TAC Section 350.4(54) as the lowest non-zero concentration standard in the laboratory's initial calibration curve and is based on the final volume of extract (or sample) used by the laboratory.

BKG Background as determined in accordance with Provision XI.F.1.

**CP Table IVA: Compliance Monitoring Program Table of Detected Hazardous Constituents and the Groundwater Protection Standard 50260**

Unit Name	Column A Hazardous Constituents	Column B Concentration Limits (mg/l)	
RESERVED	*parameter*		ND(0.00*)
	*parameter*		ND(0.00*)
	*parameter*		0.00 BKG
Add Row			

**Notes:**

- a) If there are no RCRA-regulated units subject to the Compliance Monitoring Program (Provision ?), mark “Reserved” next to the CP Table IVA heading.
- b) CP Table IVA represents the short list of hazardous constituents detected in groundwater above the quantitation limits specified in CP Table IV.
- c) CP Table IVA constituents are monitored semiannually in accordance with Provision XLF.3.c.(2) to verify that the groundwater protection standards (GWPS) are being met.

**Footnotes:**

- 1. Use Column C, specify the GWPS assigned at a POE or APOE (i.e. as applicable under TRRP). (i.e. modify Table and Footnotes to support the establishment of GWPS at POC, POE or APOE monitoring points, as appropriate). Put “N/A” if a specific program or column item is not applicable.
- 2. For each constituent of concern (COE), select the appropriate GWPS designation and definition to demonstrate that the compliance monitoring program objectives are being achieved either under the Risk Reduction Rules (RRR) pursuant to 30 TAC Chapter 335 or the Texas Risk Reduction Program (TRRP) pursuant to 30 TAC Chapter 350. The RRR and TRRP GWPS designations and definitions may not be combined pursuant to 30 TAC Section 350.2(m). Delete all designations and definitions that are not applicable.

ACL = alternative concentration limit; PQL = practical quantitation limit; PCL = protective concentration level; RSA = Remedy Standard A; RSB = Remedy Standard B

TRRP GWPS Designations and Definitions

<sup>GW</sup>GW<sub>Ing</sub>      ACL pursuant to 30 TAC Section 335.160(b) based upon the PCL determined under RSA or RSB (Residential or Commercial /Industrial) for Class 1 or Class 2 groundwater ingestion PCL of 30 TAC Chapter 350. The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table. In accordance with Section 350.72(b), <sup>GW</sup>GW<sub>Ing</sub>, PCLs may need to be adjusted to lower concentrations to meet the cumulative carcinogenic risk level (less than or equal to 1x10<sup>-4</sup>) and hazard index criteria (less than or equal to 10) when there are more than 10 carcinogenic and/or more than 10 noncarcinogenic chemicals of concern within a source medium.

<sup>GW</sup>GW<sub>Class3</sub>      ACL pursuant to 30 TAC Section 335.160(b) based upon the PCL determined

under RSA or RSB (Residential or Commercial /Industrial) Tier I for Class 3 groundwater ingestion PCL of 30 TAC Chapter 350. The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table.

<sup>Air</sup>GW<sub>Inh-V</sub> ACL pursuant to 30 TAC Section 335.160(b) based upon the PCL determined under RSA or RSB (Residential or Commercial /Industrial) for Class 1 or Class 2 groundwater inhalation PCL of 30 TAC Chapter 350. The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table.

<sup>SW</sup>GW ACL pursuant to 30 TAC Section 335.160(b) based upon the PCL determined under RSA or RSB for groundwater-to-surface water PCL of 30 TAC Chapter 350. The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table.

<sup>SED</sup>GW ACL pursuant to 30 TAC Section 335.160(b) based upon the PCL determined under RSA or RSB for groundwater-to-sediment PCL of 30 TAC Chapter 350. The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table.

<sup>ECO</sup>GW ACL pursuant to 30 TAC Section 335.160(b) based upon the PCL determined under RSA or RSB for groundwater based on ecological receptor(s) PCL of 30 TAC Chapter 350. The PCL value, Column B, will change as updates to the rule are promulgated. Changes to the rule automatically change the concentration value established in Column B in this table.

BKG Background as determined in accordance with Provision XI.F.1.

ND Non-detectable at method quantitation limit (MQL) as determined by the analytical methods of the most recent edition of EPA SW-846 and as listed in the July 8, 1987 edition of the Federal Register and later editions. MQL is indicated in parentheses. MQL is defined in 30 TAC Section 350.4 (54) as the lowest non-zero concentration standard in the laboratory's initial calibration curve and is based on the final volume of extract (or sample) used by the laboratory.

**CP Table V: Designation of Wells**

<b>Point of Compliance Wells</b>
Unit Name: Historic spillage area
Well Numbers: MW-1, MW-2, MW-3 and MW-4
<b>Point of Exposure Wells</b>
Unit Name: None
Well Numbers: None
<b>Alternate Point of Exposure Wells</b>
Unit Name: None
Well Numbers: None
<b>Background Wells</b>
Unit Name: Background Well
Well Numbers: MW-7
<b>FOA Boundary of Compliance Wells</b>
Exposure Pathway: N/A
Unit Name: None
Well Numbers: None

Wells that are not listed in this table, but are required by Permit Section XI.B.2 (e.g. AMP wells, CAO wells, etc.) and depicted only in CP Attachment A are subject to change, upon approval by the Executive Director, without modification to the Compliance Plan.

**CP Table VI: Compliance Period for RCRA-Regulated Units**

Nor Unit 1	Year or Number of Years
Year Waste Management Activities Initiated	1979
Year Closed	1999
Compliance Period (years)	16+ Years
Compliance Period Began	1997
Nor Unit 2	Year or Number of Years
Year Waste Management Activities Initiated	1979
Year Closed	1999
Compliance Period (years)	NA
Compliance Period Began	0
NOR Unit 3	Year or Number of Years
Year Waste Management Activities Initiated	1979
Year Closed	1999
Compliance Period (years)	NA
Compliance Period Began	0
NOR Unit 4	Year or Number of Years
Year Waste Management Activities Initiated	1979
Year Closed	1999
Compliance Period (years)	NA
Compliance Period Began	0
[*Unit Name*]	Year or Number of Years
Remove Last Unit	Add Unit

NOR Unit 5	Year or Number of Years
Year Waste Management Activities Initiated	1979
Year Closed	2009
Compliance Period (years)	NA
Compliance Period Began	0
Remove Last Unit	Add Unit

**CP Table VII: Reporting Requirements**

Item	Program	Reporting Frequency	Requirements
1.	All programs	Annually by January 21	Each report shall be certified by a qualified engineer and/or geologist.
2.	Corrective Action Monitoring	Annually by January 21	A table of all modifications and amendments made to this Compliance Plan with their corresponding approval dates by the Executive Director or the Commission and a brief description of each action;
3.	Corrective Action Monitoring	Annually by January 21	A summary of any activity within an area subject to institutional control.
4.	Corrective Action Monitoring	Annually by January 21	Tabulation of well casing elevations in accordance with CP Attachment C;
5.	Corrective Action Monitoring	Annually by January 21	Certification and well installation diagram for any new well installation or replacement and certification for any well plugging and abandonment;
6.	Corrective Action Monitoring	Annually by January 21	Recommendation for any changes to the program;
7.	Corrective Action Monitoring	Annually by January 21	Any other items requested by the Executive Director;
8.	Corrective Action Monitoring	Annually by January 21	Water table maps shall be prepared from the groundwater data collected pursuant to Permit Section XI.G. and shall be evaluated by the permittee with regard to the following parameters: a. Direction and gradient of groundwater flow; and, b. Estimation of the rate and direction of groundwater contamination migration.
9.	Corrective Action Monitoring	Annually by January 21	The permittee shall submit a report to each recipient listed in <u>Provision XI.J.3.</u> , which includes the following information in items 3 through 25 determined since the previously submitted report, if those items are applicable.
10.	Corrective Action Monitoring	Annually by January 21	The Corrective Action System(s) authorized under Provision XI.B.3. in operation during the reporting period and a narrative summary of the evaluations made in accordance with Permit Sections XI.E, XI.F., and XI.G. for the preceding reporting period. The reporting period shall be January 1 through December 31 for Corrective Action Monitoring, unless an alternative schedule is approved by the Commission.

Item	Program	Reporting Frequency	Requirements
11.	Corrective Action Monitoring	Annually by January 21	The method(s) utilized for management of recovered/purged groundwater shall be identified in accordance with <u>Provision XI.B.8.</u> The permittee shall maintain this list as part of the facility operating record and make it available for inspection upon request.
12.	Corrective Action Monitoring	Annually by January 21	An updated table and map of all monitoring and corrective action system wells. The wells to be sampled shall be those wells proposed in the Compliance Plan Application referenced in <u>Provision XI.A.7.</u> and any changes subsequently approved by the Executive Director pursuant to <u>Provision XI.B.3.</u> Provide in chronological order, a list of those wells which have been added to, or deleted from, the groundwater monitoring and remediation systems since original issuance of the Compliance Plan. Include the date of the Commission's approval for each entry;
13.	Corrective Action Monitoring	Annually by January 21	The results of the chemical analyses, submitted in a tabulated format acceptable to the Executive Director which clearly indicates each parameter that exceeds the Groundwater Protection Standard (GWPS). Copies of the original laboratory report for chemical analyses showing detection limits and quality control and quality assurance data shall be provided if requested by the Executive Director;
14.	Corrective Action Monitoring	Annually by January 21	Tabulation of all water level elevations required in <u>Provision XI.F.3.d.(1)</u> , depth to water measurements, and total depth of well measurements collected since the data that was submitted in the previous monitoring report;
15.	Corrective Action Monitoring	Annually by January 21	Potentiometric surface maps showing the elevation of the water table at the time of sampling, and the direction of groundwater flow gradients;
16.	Corrective Action Monitoring	Annually by January 21	Tabulation of all data evaluation results pursuant to <u>Provision XI.F.4.</u> and status of each well with regard to compliance with the Corrective Action objectives and compliance with the GWPS;
17.	Corrective Action Monitoring	Annually by January 21	An updated summary as required by CP Table VIII;
18.	Corrective Action Monitoring	Annually by January 21	Summary of any changes made to the monitoring/corrective action program and a summary of well inspections, repairs, and any operational difficulties;

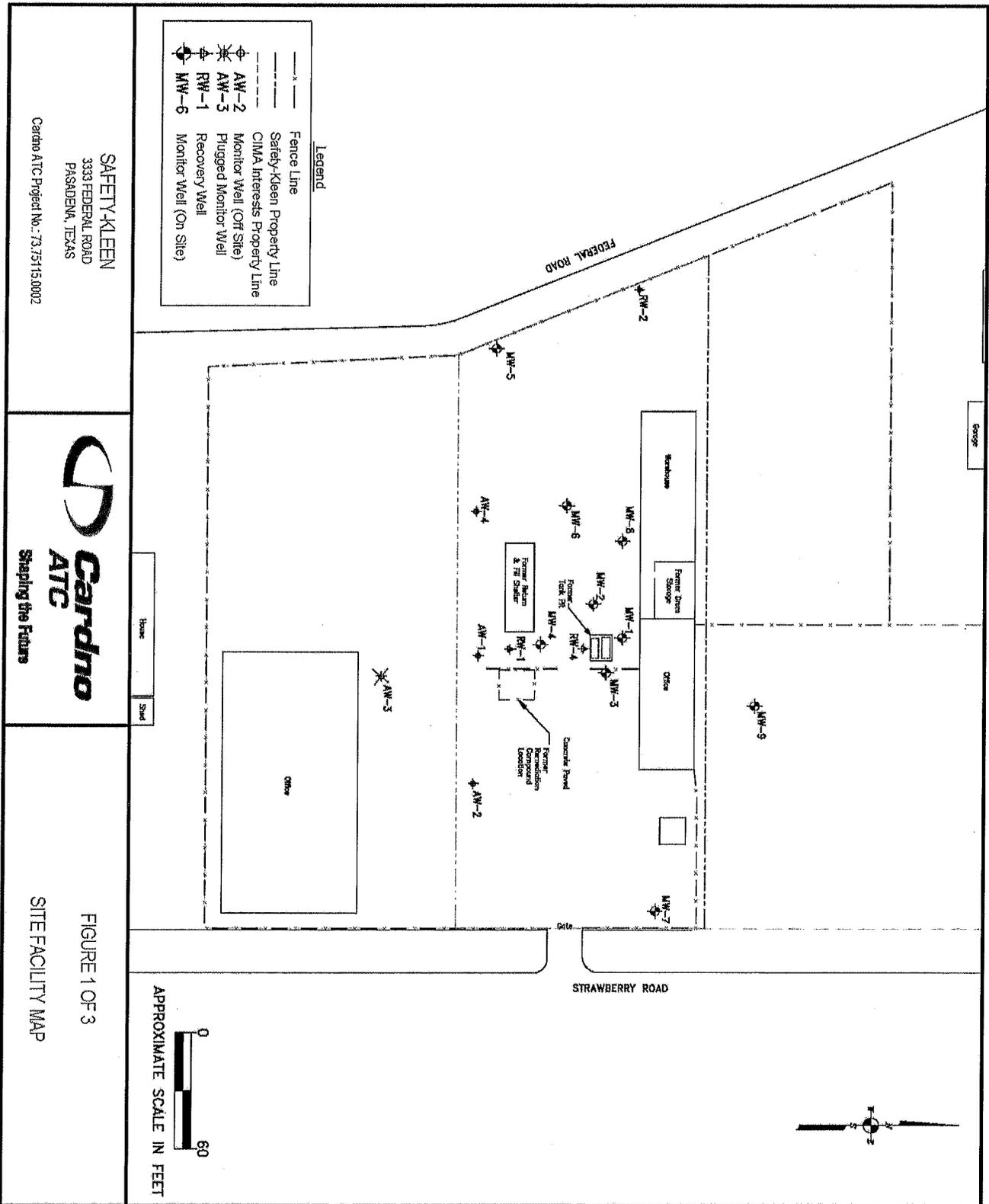
Item	Program	Reporting Frequency	Requirements
19.	Corrective Action Monitoring	Annually by January 21	A notation of the presence or absence of non-aqueous phase liquids (NAPLs), both light and dense phases, in each well during each sampling event since the last event covered in the previous monitoring report and tabulation of depth and thickness of NAPLs, if detected;
20.	Corrective Action Monitoring	Annually by January 21	Quarterly tabulations of quantities of recovered groundwater and NAPLs, and graphs of monthly recorded flow rates versus time for the Recovery Wells during each reporting period. A narrative summary describing and evaluating the NAPL recovery program shall also be submitted;
22.	Corrective Action Monitoring	Annually by January 21	Maps of the contaminated area where GWPSs are exceeded depicting concentrations of CP Table IIIA constituents and any newly detected CP Table III constituents as isopleth contours or discrete concentrations if isopleth contours cannot be inferred. Areas where concentrations of constituents exceed the GWPS should be clearly delineated.
23.	Corrective Action Monitoring	Annually by January 21	Maps and tables indicating the extent and thickness of the NAPLs both light and dense phases, if detected;
24.	Corrective Action Monitoring	Annually by January 21	Corrective Measures Implementation (CMI) Progress Report or Response Action Effectiveness Report or Response Action Completion Report to be submitted as a section of the Compliance Plan report in accordance with <u>Provision XI.H.6.</u> , if necessary. The permittee will include a narrative summary of the status of the approved final corrective measures conducted in accordance with the approved CMI Workplan or RAP, and that the requirements of <u>Provision XI.H.7.</u> are being met.
25.	Corrective Action Monitoring	Annually by January 21	The permittee will include a narrative summary of the status of each Solid Waste Management Unit (SWMU) and/or Area of Concern (AOC) subject to the requirements of Permit Section XI.H. and ICM Program for a SWMU and/or AOC which documents that the objectives of <u>Provision XI.H.8.b.</u> are being achieved. This summary shall be included as a section of the Compliance Plan report.

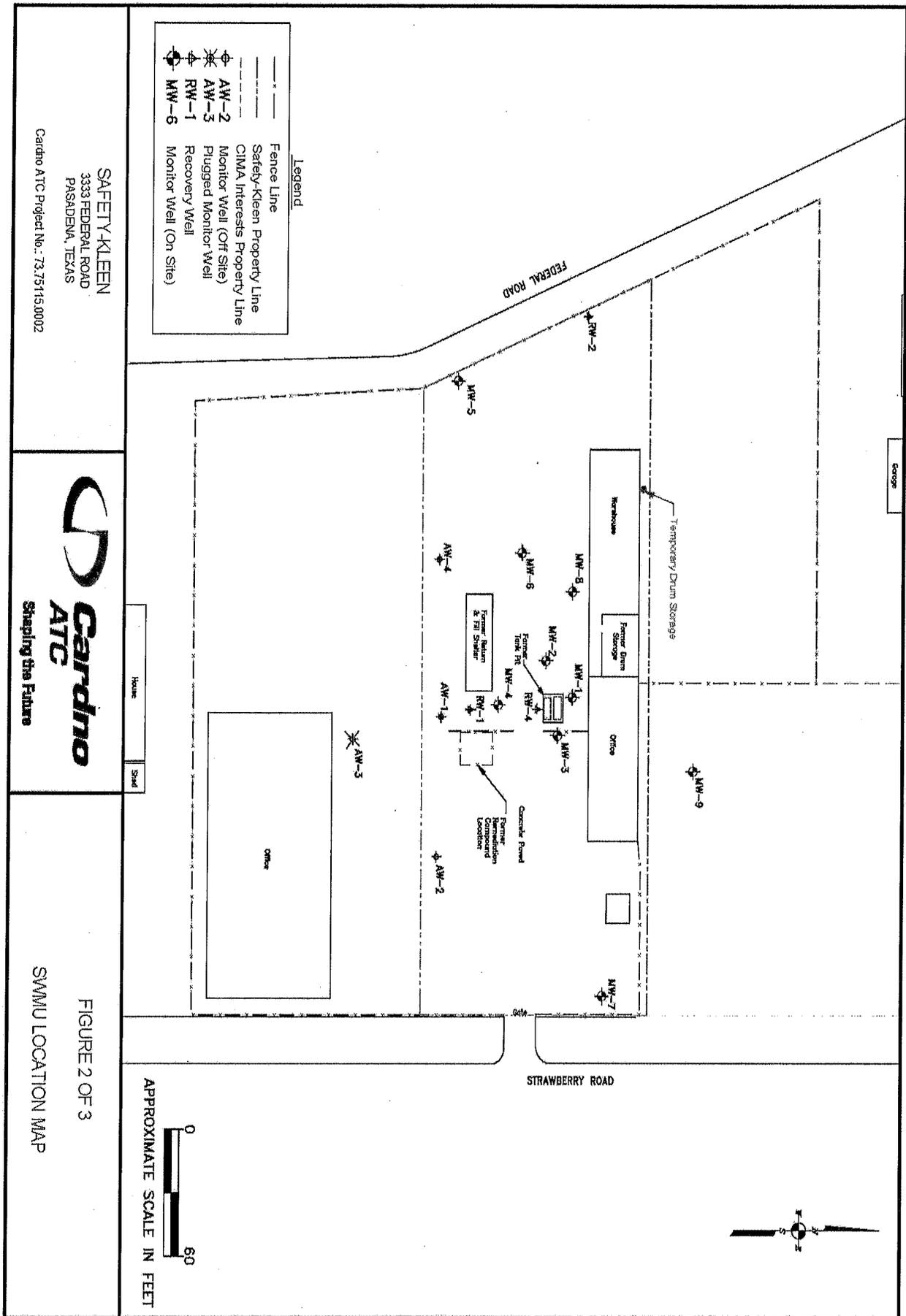
**CP Table VIII: Compliance Schedule**

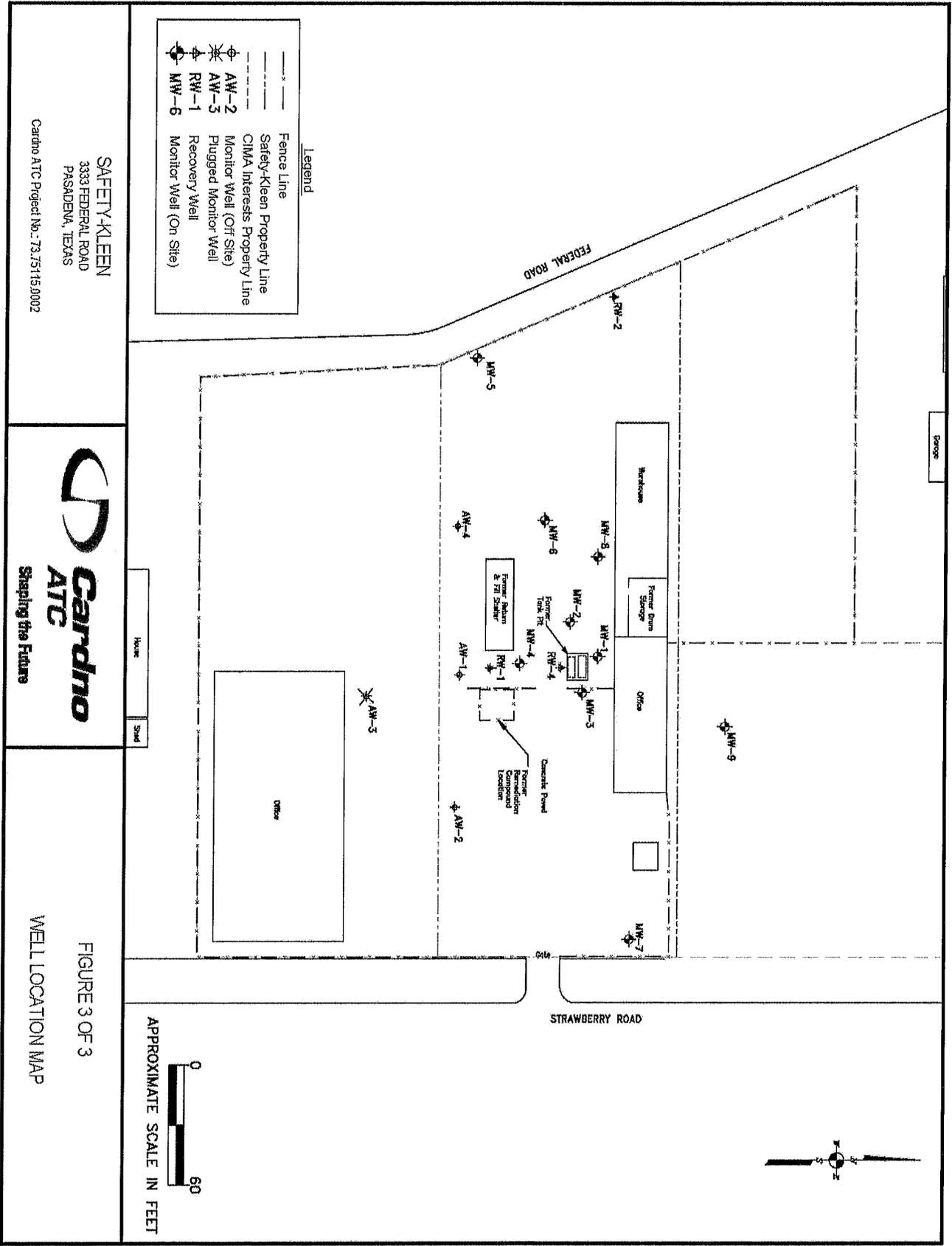
<b>Item</b>	<b>Compliance Schedule</b> (from the date of issuance of the Compliance Plan unless otherwise specified)	<b>Regulatory Citation</b>	<b>Requirement</b>
A.	60	Compliance Plan	Submit to the Executive Director a schedule summarizing all activities required by the Compliance Plan. The schedule shall list the starting dates of all routine activities. The permittee shall include an updated schedule in the groundwater monitoring report required by <u>Provision XI.G.3</u> . The schedule shall list the activity or report, the Compliance Plan Section which requires the activity or report and the calendar date the activity or report is to be completed or submitted (if this date can be determined.)
B.	Notify within 30 days	30 TAC §350.33(k)	After an unexpected event occurs, or a condition is detected, during post-response action care period which indicates that additional response actions will be required at an affected property.

# **CP Attachment A**

## **Figures**







**SAFETY-KLEEN**  
 3333 FEDERAL ROAD  
 PASADENA, TEXAS  
 Cardno ATC Project No.: T3.75115.0002



FIGURE 3 OF 3  
 WELL LOCATION MAP

**CP Attachment B**  
**RESERVED**

**CP Attachment C**  
**Sampling and Analysis Plan**

# GROUNDWATER SAMPLING AND ANALYSIS PLAN

Hazardous Waste Permit No. HW-50260-001  
Compliance Plan No. CP-50260  
Safety-Kleen Systems, Inc. – Pasadena Facility

## 1.0 INTRODUCTION

Safety-Kleen Systems, Inc. has established a corrective action program to monitor releases of hazardous constituents from Area AA as shown on the site map (Figure 1) of the facility at 3333 Federal Road, Pasadena, Texas 77504. As part of the Compliance Plan, Safety-Kleen is responsible for installation, operation, and maintenance of a Groundwater Monitoring System to evaluate the effectiveness of the Corrective Action Program.

Groundwater sampling and analysis under this program will be conducted according to this Sampling and Analysis Plan and in accordance with the USEPA publication, "Test Methods for Evaluating Solid Waste, Third Edition, (SW-846)".

Copies of this Groundwater SAP will be maintained in the files at the Safety-Kleen Pasadena facility and used by personnel conducting sampling activities in the field. This SAP supersedes any previous SAP.

## 2.0 PRE-MOBILIZATION ACTIVITIES

### 2.1 Sampling Program Coordination

Prior to mobilization to the field for the sampling program, sampling personnel will review the Groundwater SAP to ensure collection of all necessary field data and conformance with the procedures described below. All necessary equipment will be procured and/or prepared for use prior to commencement of field activities.

The sampling program will be coordinated with the contract laboratory to ensure that properly prepared sample kits are available. The sample kits will include all necessary sample containers with closures and appropriate preservatives; coolers; waterproof labels; and chain-of-custody/analysis request forms.

Records of sampling events are maintained in logbooks and/or on standardized form such as the examples attached with this SAP, or other appropriate forms. Information to be recorded during the sampling event includes the following:

- Identification of sampling personnel;
- Identification of wells measured/sampled;
- Dates and times of measurement/sample collection;
- Results of static water level measurements and well soundings;
- Deficiencies in the physical condition of wells noted during well inspections;
- Purging/sampling methods and volumes;
- Results of field water quality measurements and visual inspection of samples; and
- Analyses to be performed, container types, and preservatives.

## **2.2 Health and Safety Plan Review**

Field personnel will review the Health and Safety Plan prior to mobilization. Based on previous experience with groundwater sampling at Safety-Kleen, modified Level D protection, consisting of coveralls, hard hat, safety glasses, and steel-toed shoes, is adequate to ensure worker protection. Latex or other chemical resistant gloves will be worn during well purging and sampling. Field personnel will also review health and safety procedures for the Safety-Kleen facility to insure that all field personnel are prepared in the event of a medical emergency.

## **3.0 SAMPLING EQUIPMENT AND PROCEDURES**

### **3.1 Static Water Level Survey**

During each sampling event, a static water level survey will be conducted prior to well purging and sampling. The top of each well has been surveyed to a standard elevation.

Static water levels will be measured from the top of casing using an electronic water level indicator or other suitable device in all designated wells during each sampling event. Data will be recorded in logbooks and/or on forms (see attachments). To minimize the potential for cross-contamination, wells that have historically been clean will be measured before wells with elevated constituent concentrations. The downhole measuring device will be thoroughly rinsed with distilled or deionized water between well locations.

### **3.2 Well Integrity Inspection**

Prior to purging, wells without permanently installed pumps will be sounded to total depth to detect the presence of silt accumulation at the base of the well or other obstruction. For each monitoring well or recovery well having a permanently installed pump, the total depth will be measured when the pump is pulled for maintenance or replacement, or when the production rate of the recovery well decreases by 25% or more from the baseline production rate.

The wells will also be inspected to confirm well integrity and identify needed repairs. Well inspections will document any observed deficiencies in the condition of the well casing, cap/protective cover, surface pad, and dedicated sampling equipment, if applicable. Any noted exceptions will be recorded in the logbooks or standard forms and brought to the attention of appropriate Safety-Kleen personnel upon completion of the sampling event.

### **3.3 Well Purging**

#### Purging Equipment and Method

Wells to be sampled will be purged by slow-purge pumping prior to sample collection. Acceptable pumps include peristaltic and submersible electric pumps. When non-dedicated pumps are used for purging, they will be thoroughly cleaned prior to use in each well.

Non-dedicated pumps and associated cable will be cleaned by running the pump for several minutes each in: 1) a bucket of non-phosphate soap solution; 2) a bucket of deionized or distilled water; and 3) a second bucket of deionized or distilled water. The pump and cable will be submerged in the buckets during the cleaning process. The soap solution and rinse water buckets will be prepared at the beginning of each day and are replaced after four cycles of pump cleaning. At least once per day, in which non-dedicated pumps are used, a sample will be taken from the

final rinse water bucket after completion of four cycles of pump cleaning. The samples will be analyzed for the parameters listed in Table 1. As an alternative to cleaning, as described above, the tubing used in a peristaltic pump can be replaced with new, unused tubing between use in each well.

Purging of each well may be accomplished through removing water using “micro-purging” until water quality indicator parameters stabilize. Either method should employ low-flow (i.e., a flow rate that does not exceed the rate at which the well was developed, 0.1 L/minute) techniques to minimize stress on the aquifer. Water level drawdown provides the best indication of stress imparted by a given flow-rate for a given hydrogeological situation. If a pump is used, the intake should be placed immediately below the air/water interface.

#### Management of Purge Water

The water will be managed onsite, or transported to an approved off-site facility for treatment and/or disposal.

### **3.4 Groundwater Sample Collection**

#### Timing of Sampling

The corrective action monitoring program will be conducted on a quarterly basis. Semi-annual reports will be submitted to the TCEQ to document monitoring program results.

#### Sampling Order of Wells and Timing of Sample Collection

To minimize potential for cross-contamination, wells included in the sampling program that have historically been clean will be sampled before wells previously showing elevated constituent concentrations. Sampling will be conducted as soon as practicable following purging. In the event that a well has been purged, but cannot be sampled on the same day, the well may be sampled within 24 hours following completion of purging without additional purging.

#### Sampling Equipment

Monitoring well will be sampled using either dedicated or non-dedicated equipment. Acceptable sampling devices include a syringe sampler (bailer) or the following submersible pumps: gear drive, bladder, helical rotor, piston (gas-driven), and centrifugal (low-rate). Equipment made from inert, non-reactive materials such as Teflon, stainless steel, Tygon, or other suitable materials will be used. If non-dedicated equipment is used, the equipment will be thoroughly cleaned as described above prior to use in each well, or will be replaced with new equipment.

#### Groundwater Sample Handling

Groundwater samples will be collected and handled in such a way so to minimize the potential for cross-contamination, loss of volatile constituents, or other interferences. Sampling personnel will wear clean latex, nitrile, or other suitable chemical resistant, non-reactive gloves when handling sampling equipment and containers, and will minimize contact with the sampled groundwater. Care will be taken to prevent contact of the downhole sampling equipment such as pumps, bailers, and cords, with the ground or other potential sources of sample contamination. Gloves will be changed between sampling locations.

Groundwater samples will be collected using techniques appropriate for the analytes to be tested. If pumps are used to collect samples for VOCs, the sampling flowrate will be regulated so the samples are collected at relatively low flow rates (approximately 100 ml/min). When bailers are used for sample collection, they will be lowered into the well slowly and poured carefully to minimize agitation. Samples for analysis of volatile compounds will not be collected using techniques that could excessively aerate the samples.

Collected samples will be retained in coolers pending transport to the laboratory with adequate ice to maintain samples at a temperature of approximately 4° C until received by the laboratory.

#### Sample Appearance and Field Parameter Analysis

A sample will be collected at each location for field analysis of temperature, specific conductance, pH, turbidity, dissolved oxygen, and oxidation-reduction potential (ORP). Equipment used to measure these parameters will be calibrated beforehand on the day of sampling. Equipment out of calibration by 10% or more will not be used for field measurements. Laboratory measurements of specific conductance and/or pH made within 24 hours of sample collection may augment or replace field measurements, in the event of field instrument malfunction or other factors.

The color, turbidity, and odor of each sample along with the field analysis parameters will be noted by the field technician and recorded in a logbook or on a field sample form (see attachments). Purge volume information, field parameter test results, and other sample information will also be recorded in a logbook and/or on a form.

#### Sample Containers, Preservatives, and Labels

Samples will be collected in clean, method-specified containers, with appropriate preservatives, supplied by the laboratory. The appropriate sample container and preservative for each analysis are specified on Table 2. Prior to use, sample containers will be stored, with lids secured, in a clean cooler or box.

Once a sample is collected, the sample container will be secured with a tight-fitting lid and a waterproof adhesive label affixed. The label will include sample identification, time and date of collection, sampler's initials, and other pertinent information, as appropriate. The sample containers will be retained in a cooler at or below 4 degrees Celsius as described above pending transport to the laboratory.

#### Sample Custody Control, and Shipment and Receipt of Samples

Sampling personnel will be responsible for the care of collected samples until custody has been transferred to the laboratory, courier, or shipping department. Sample custodians will assure that the sample containers are in the custodians' physical possession, in view at all times, or stored in a secure area to prevent tampering.

After sample collection, the chain-of-custody forms will be filled out in ink, in legible writing, listing all sample containers and will accompany the samples throughout all phases of shipment and handling (see attached example chain-of-custody form). Samples will be packed on sufficient ice to achieve a temperature of 4 degrees Celsius and sealed prior to shipment. To the extent practical, samples will be submitted to the laboratory within 24 hour of sample collection.

If samples are delivered to the laboratory by a third party courier, a custody seal will be affixed to the cooler such that the cooler cannot be opened without breaking the seal.

Upon delivery of samples to the laboratory or courier, the sampler will retain a copy of the chain-of-custody form, signed by the sampler and/or laboratory personnel indicating the date and time the samples were relinquished and received. A copy of the chain-of-custody form showing all signatures from the sampler to the laboratory will be incorporated in the corrective action monitoring program records.

### **3.5 Collection of Quality Control Field Samples**

For the purpose of the field sample Quality Control (QC) program, two laboratory-prepared Trip Blanks per sampling event will be submitted for analysis of volatile organic compounds. One Field Blank will be collected per day of sampling for analysis of the parameters listed on Table 1. Duplicate Samples will be collected from selected wells at a frequency of one Duplicate Sample for every ten groundwater samples collected per sampling event. The Duplicate Samples will be submitted for analysis of the parameters listed on Table 1.

## **4.0 ANALYTICAL LABORATORY PROCEDURES**

Upon receipt, the laboratory will measure the internal temperature of each sample cooler. The samples will then be logged in and maintained at the appropriate temperature pending extraction and/or analysis within the method-specified holding times. In the event of sample container breakage or other problems with the sample shipment, the laboratory will contact the sampling contractor immediately.

Groundwater samples will be analyzed in accordance with EPA-specified protocol or other approved methods. Table 1 lists the compounds to be analyzed during the corrective action monitoring program. Table 2 lists the analytical methods, containers, preservatives, and holding times for the groundwater monitoring parameters.

### **4.1 Laboratory Methods and Sample Containers**

Laboratory methods for analysis of various groundwater constituents and the appropriate sample containers and preservation methods are specified on Table 2. All laboratory analyses will be performed in accordance with the QA/QC protocol specified in USEPA publications “Test Methods for Evaluating Solid Waste”, SW-846, 1996; “Methods for Chemical Analysis of Water and Wastes”, EPA/600/4-79-20, 1983; or other appropriate methods. Minimum laboratory QA/QC requirements are outlined below.

### **4.2 Data Reduction, Validation, and Management**

#### Data Reduction

Calculations and data reduction will be completed by laboratory personnel in accordance with procedures specified by USEPA in “Test Methods for Evaluating Solid Waste”, SW-846, 1996; “Methods for Chemical Analysis of Water and Wastes”, EPA/600/4-79-020, 1983; or other appropriate methods. Procedures, units, and equations used in data reduction will be consistent with the analysis method.

### Data Validation

The contracted laboratory will verify that the data are properly documented and filed according to chain-of-custody records, and that calculations made from raw data are correct. Results from calibration standards will be examined to ensure they are within expected ranges. Blank, duplicate, spike, standard, and QC data for each batch will be examined to ensure conformance with specified QA/QC goals.

### Data Management

The sampling contractor will be responsible for tabulation, management, and statistical analysis of analytical data received from the laboratory.

## **4.3 Laboratory Quality Control Analyses**

To monitor system performance, control samples, including blanks, duplicates, spike duplicates, analytical standards, and reference materials, will be incorporated in the operation of the laboratory facility. The laboratory selected to complete the specified analyses must submit laboratory QC data consistent with the provisions specified in this SAP. Minimum QC sampling and testing requirements follow.

### Matrix Spikes

Matrix spike samples will be run at a frequency of one per sample batch, one per every 20 samples analyzed, or consistent with EPA guidance. The results from these analyses will be compared to the control limits established for precision and bias to assess whether or not the analysis is in statistical control.

### Method Blanks

To monitor potential contamination in the laboratory, method blanks will be run at the frequency of one every 20 samples, or a minimum of one per sample batch, or as specified in EPA guidance. For organic analyses, blank results will be acceptable if the concentration of the target analytes in the blank are below the practical quantitation limit for each analyte. In accordance with EPA guidance (USEPA, 1988), exceptions will be made for common laboratory contaminants (methylene chloride, acetone, 2-butanone, toluene, and phthalate esters may be present at concentrations up to five times the method-specified practical quantitation limit) and the results for the blank will still be acceptable.

### Matrix Spike Duplicates

Analysis of a matrix spike duplicate will be used to determine matrix-specific precision. A matrix duplicate or matrix spike duplicate will be run at the frequency of one in 20, or a minimum of one per sample batch, or as specified in EPA guidance.

## **4.4 Preventive Maintenance**

Routine maintenance of instrumentation will be performed per manufacturer's recommendations according to standard operating procedures for each piece of equipment. Qualified instrument technicians will be consulted as required for repair, maintenance, or advice. The laboratory

Quality Assurance Project Plan (QAPP) will include maintenance procedures for laboratory instrumentation.

#### **4.5 Data Assessment Procedures and Corrective Action**

Procedures for evaluating the precision, accuracy, representativeness, and comparability of laboratory test results are detailed in the EPA publications “Test Methods for Evaluating Solid Waste” and “Methods of Chemical Analysis of Water and Wastes”. As an indicator of statistical control, precision and bias will be estimated by tracking spike recoveries and standard deviations of replicates. Corrective action will be taken when QC data are outside acceptable precision and accuracy values, blank concentrations exceed acceptable limits, or unanticipated changes in method detection limits are encountered. Corrective action may include recalibration of instruments with freshly prepared standards, replacement of solvents or reagents giving high blank values, additional training, or other appropriate measures.

## TABLE 1

### ANALYTICAL PARAMETERS Safety-Kleen Systems, Inc. – Pasadena

#### 1a – Detected Hazardous and Solid Waste Constituents (Table II – Corrective Action Program)

Acetone  
Benzene  
Chlorobenzene  
Chloroethane  
Chloroform  
1,2-Dichlorobenzene  
1,4-Dichlorobenzene  
1,1-Dichloroethane  
1,2-Dichloroethene (total)  
Ethyl benzene  
Methyl Ethyl Ketone (2-Butanone)  
Tetrachloroethene  
Toluene  
1,1,1-Trichloroethane  
Trichloroethene  
Vinyl chloride  
Xylene (total)  
Chromium  
Lead

#### 1b – Indicator Parameters (Table III – Corrective Action Program)

Benzene  
Chlorobenzene  
1,2-Dichlorobenzene  
1,4-Dichlorobenzene  
1,1-Dichloroethene  
1,2-Dichloroethane

1,2-Dichloroethene (total)

Ethylbenzene

1,1,1-Trichloroethane

Toluene

Vinyl Chloride

Xylenes (total)

**TABLE 2**

**ANALYTICAL METHODS, CONTAINERS, PRESERVATIVES AND HOLDING TIMES**  
 Safety-Kleen Systems, Inc. – Pasadena

<b>Constituent</b>	<b>Analytical Method Numbers</b>	<b>Sample Container and Preservative</b>	<b>Maximum Holding Time</b>
<i>Volatile Organic Compounds</i>			
Acetone Benzene Chlorobenzene Chloroethane Chloroform Dichlorobenzene 1,1-Dichloroethane 1,2-Dichloroethene (total) Ethyl benzene Methyl Ether Ketone (MEK) Methyl Isobutyl Ketone (MIBK) Tetrachloroethene Trichloroethane Trichloroethene Toluene Vinyl chloride Xylene (total)	EPA 8260B	(3) 40 ml glass vials, headspace free / HCl (pH<2), cool to 4°C	14 days
<i>Metals</i>			
Chromium Lead	EPA 6010B	8 oz. Polyethylene or glass / HNO <sub>3</sub> (pH<2), cool to 4°C	6 months

Appendix XII  
Hazardous Waste Permit Application Fee

List of Appendices	
Appendix XII.A	Table XII.A. – Hazardous Waste Units (for Application Fee Calculations)
Appendix XII.B	Table XII.B – Hazardous Waste Permit Application Fee Worksheet

**Table XII.A. - Hazardous Waste Units (For Application Fee Calculations)**

Verbal Description of Unit	Rated Capacity	Surface Acreage <sup>1</sup>	# of Unit Types <sup>2</sup>	Identical Unit Justification <sup>3</sup>
Sump	N/A	<1	1	
Recovery Unit	N/A	<1	1	
		Total <sup>4</sup> <1	Total <sup>4</sup> 2	

1. Number of calculated acres.
2. Enter number of units except for units identical in type and use which only count toward a single \$500.00 fee.
3. Explain justification for any units claimed as identical in type and use.
4. Enter these totals on the worksheet.

**Table XII.B. - Hazardous Waste Permit Application Fee Worksheet**

Name of Facility: Safety-Kleen Systems, Inc

Solid Waste Registration Number: 77143

1. Process Analysis - \$1,000.....	\$ <u>1000</u>
2. Facility Management Analysis - \$500.....	\$ <u>500</u>
3. Unit Analysis - <u>2</u> units @ \$500 per unit.....	\$ <u>1000</u>
4. Site Evaluation - <u>.9</u> acres @ \$100 per acre.....	\$ <u>100</u>
(Maximum of 300 acres)	
5. Minor amendment, Class 1, or Class 1 <sup>1</sup> modification - \$100.....	\$ <u>100</u>
6. Cost of Providing Notice - \$50 (+ \$15 for a renewal).....	\$ <u>65</u>

**Pay This Amount**

**Total \$ 2,765**

Pay Online through ePay portal [www3.tceq.texas.gov/epay/](http://www3.tceq.texas.gov/epay/)

Enter ePay Trace Number: 582EA000711102

For Payment by check, make checks Payable To:

Texas Commission on Environmental Quality - Fund 549  
(*your canceled check will be your receipt*)

Complete And Return With Payment To:

Texas Commission on Environmental Quality  
Financial Administration Division - MC 214  
P.O. BOX 13088  
Austin, Texas 78711-3088

The applicant's fees are subject to evaluation by the technical staff of the Texas Commission on Environmental Quality (TCEQ). However, the TCEQ reserves the right to assess further fees as may be necessitated.

Please do not submit a photocopy of the check (or equivalent transaction submittal) with your application packet but provide only the following account information:

Check No.	Date of Check	Check Amount